CONEWAGO

Safety Manual

1/31/2024
Revision

CONEWAGO

December 8, 2023

Safety Policy Statement

To Include: Conewago Steel Systems
Conewago Enterprises
Conewago Ready Mix
Conewago Precast Building Systems
Conewago Facilities Group

Our employees are our most valuable asset. We are committed to providing all employees a safe workplace. In an effort to fulfill this commitment, safety policies have been enacted that identify the minimum safe standards we must follow. Everyone within our divisions has assigned safety responsibilities. The policies and responsibilities are not all inclusive; however, they are the foundation for a safe work environment. Additional safe work practices may be required depending on the work to be performed. Whenever there is a conflict between policy and law, legal standards must be obeyed.

Safety is the responsibility of all employees. We depend on every employee to do their part in making our safety program an effective one. Anyone who knowingly works in an unsafe manner risks his or her continued employment with Conewago and all of its divisions.

I consider the safety of our personnel to be of prime importance, and I expect your full cooperation in making our program effective.

Donald B. Smith, Jr. President

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Safety Rules

These safety rules have been established to include everyone employed by Conewago. Safety rules also apply to all subcontractors as well as all vendors and visitors. Failure to obey the rules (on the part of any employee) will result in disciplinary action in accordance with company policy. Subcontractors who willfully violate the safety rules will be considered in breach of their agreement. Any vendor or visitor who knowingly violates the safety rules will be escorted off the premises. Enforcement of the safety rules shall be the responsibility of management or their designated representatives. The rules have been enacted to concisely emphasize existing company policies, as well as state and federal regulations. Whenever minimum standards conflict between the safety rules and established law, the law shall take precedence. Whenever the safety rules exceed legal requirements, the rules shall be obeyed.

1. No person will be permitted to enter any worksite while under the influence of alcohol or drugs. No alcohol, drugs, or firearms will be brought onto any jobsite.

2. All project construction sites, production lines and plant operations (except office areas and parking lots) are considered “Hard Hat Areas”. **Hard hats are mandatory PPE and will be strictly enforced.**

3. Horseplay, and other acts which tend to have an adverse influence on the safety and well-being of employees shall be prohibited.

4. Hard toe, leather, laced boots will be worn at all times by employees and subcontractors assigned to project construction, warehouse duties, steel production areas and plant operations.

5. Long pants (jeans, work pants) and minimum shoulder length shirts will be worn at all times (no tank tops). Sweatpants are not allowed. Sleeves must extend at least 3” below shoulder. No loose clothing is to be worn around machinery. All onsite workers are to wear Hi-Viz outerwear.

6. Approved Safety glasses shall be worn at all times by employees and subcontractors assigned to project construction, warehouse duties, steel production areas and plant operations. Additional facial protection, i.e. face shields, will be worn when chipping, grinding, welding, cutting, or working with compressed air.

7. Task appropriate gloves will be worn at all times by employees and subcontractors assigned to project construction, warehouse duties, steel production areas and plant operations.

8. Hearing protection will be worn at all times when noise levels or duration of exposure exceeds those specified in OSHA’s Permissible Noise Exposures Table D-2, 1926.52. Headphones and earbuds are not allowed.

9. Special safety equipment will be worn whenever required under particular hazardous conditions. A Job Safety Analysis and appropriate testing of air and materials will be completed to determine appropriate controls necessary to

continue work. Hazardous conditions may include asbestos exposed during demolition type of work.

10. All worksites are to be cleaned daily of trash and scattered construction waste.

11. All motorized equipment will be inspected daily, prior to operation. Report any unsafe or damaged equipment immediately.

12. All tools, ladders, cables, ropes, slings, etc. shall be inspected daily prior to use. Broken or worn equipment should be removed from service and replaced immediately.

13. Company vehicles shall be operated by authorized employees. All registered and licensed company vehicles operated on public highways shall be driven by authorized employees who are legally licensed to operate the particular class of vehicle to which they have been assigned. No company vehicle may be used at any time for passenger transport, such as rideshare (ie: UBER) or on-demand food/package delivery (ie: DoorDash)

14. All cranes and any equipment that is used to lift materials or personnel will be inspected daily. A written inspection report will be completed prior to the operation of the equipment.

15. No confined space will be entered without a proper entry permit issued by an authorized person.

16. Riding on equipment is only allowed where seats are provided. Seatbelts, where provided, are to be used by all operators, drivers, passengers and occupants of company vehicles.

17. All highway vehicular accidents involving company employees or property are to be reported to the Safety Director as soon as possible. A written report shall follow within 24hrs.

18. All motorized construction equipment must have an operable back-up alarm. No one is authorized to disconnect a back-up alarm. All non-operating alarms will be reported daily.

19. No motor vehicle shall be left unattended with the engine running.

20. All equipment shall be shut down before the operator leaves the operating seat, or the vehicle is serviced or refueled. When shut down, all buckets will be placed on the ground or other assigned support.

21. Portable equipment powered by gasoline, mixed gas, kerosene, diesel fuel, or other combustible or flammable fuel shall be refueled in a safe environment. NO refueling or repairs to fuel lines shall be conducted inside an enclosed structure. Fuels shall not be stored in an enclosed structure unless it has been designed for that specific purpose.

22. Ladders, stairs, or ramps will be used to provide access where the break in elevation is 19 inches or more. All ladders will be properly secured and extended

at least 3 feet above the upper surface. Damaged ladders will be removed from service.

23. All electrical equipment shall be properly grounded. All powered tools, electrically powered equipment, and temporary wiring and cords shall be GFCI protected. All temporary power cords (extension cords) shall be rated for **hard or extra-hard** use and adhere to current OSHA regulations for construction use. Any damaged extension cord or any cord that does not comply with current standards shall be immediately removed from service. All electrical repairs must be done by a qualified electrician.

24. All loads on trucks, trailers, etc. will be properly secured before being moved, no matter the distance.

25. All floor openings will be covered or properly barricaded and identified.

26. Sharp objects will be removed (nails, etc.) or covered (rebar) to prevent puncture wounds.

27. No one is permitted to work under or near an overhead load. Tag lines shall be utilized at the discretion of the competent person in charge of rigging.

28. Loads shall be lifted properly, with back straight and knees bent, keeping load close to your torso. Do not attempt to lift objects that are too heavy to lift alone. Ask someone to assist you.

29. All excavations shall be properly shored or sloped in accordance with Conewago policy and current OSHA standards.

30. Fire extinguishers shall be carried in all company vehicles and office trailers. OSHA Fire Safety standards shall be followed where flammable and combustible materials are used or stored.

31. Grab bars and steps shall be utilized when getting on and off equipment (no jumping).

32. The handling of explosives will be conducted only by qualified and assigned personnel. Blasting will be conducted by qualified and licensed personnel.

33. Report all unsafe acts, equipment, or conditions to your supervisor immediately.

34. All construction site accidents and incidents involving injury or damage are to be reported immediately to the site superintendent. A written report must be prepared by the superintendent and involved person(s) and forwarded to the safety department within 24 hours or as soon thereafter as possible.

33. There will be no tobacco use, vaping, or e-cigarettes on job sites or in Conewago owned vehicles.

34. Personal cell phone use, including personal calls, texts, e-mail, or other electronic communications, must be limited to breaks and lunch time only. If you have a family

emergency and need to leave your cell phone turned on, please notify your supervisor of this situation in advance. Any violation of this policy will result in disciplinary action.

35. **ALL employees have STOP work authority and the responsibility to report any unsafe act or situation to a Foreman or Supervisor.**

Duties and Responsibilities

Management

1. Establish and enforce policies and procedures to provide safe working conditions for all employees.

2. Provide training, as needed, for employees relative to safe working practices and policies.

3. Maintain records regarding all accidents.

4. Require all subcontractors to follow our safety policies and procedures.

5. Conduct safety inspections of all jobsites.

6. Provide current Safety Data Sheets (SDS) for each job.

7. Respond to media requests for information involving all matters concerned with safety.

Duties and Responsibilities

Superintendents/Foremen

1. Actively support with deeds and decisions, all established safety policies, and procedures.

2. Enforce safety policies and procedures.

3. Conduct and document weekly “Toolbox” safety talks on assigned training topics with all site employees.

4. Conduct and document daily jobsite safety inspections. Documentation must be forwarded to dispatch on daily reports.

5. Conduct daily morning huddles to communicate safety hazards related to assigned work duties, production, and quality goals. Huddles should be repeated when work changes, a safety hazard develops, and the end of the day.

6. Instruct assigned personnel in potential hazards involved in the current work.

7. Investigate all accidents on jobsites and report to the Safety Director as soon as possible (NLT the day it occurs).

8. Maintain a safe and clean worksite.

9. Correct all hazards, unsafe conditions, and practices.

10. Maintain current Safety Data Sheets.

11. Maintain current First Aid/CPR proficiency.

12. Maintain and post a current list of emergency phone numbers and a complete first aid kit onsite.

13. Provide and maintain all safety equipment necessary for the worksite.

Special Notice to Superintendents/Foremen

Any unsafe condition created by a subcontractor, which could cause injury to our employee, or employees of other subcontractors should be immediately reported to the subcontractor and so noted in your job log.

Failure to correct the condition should be reported to the Safety Director.

Keep in mind that while you are in charge of the jobsite, you are responsible and may be held liable for any and all accidents, whether involving our employees or not.

While you are not responsible for a subcontractors' safety program, you are responsible for safety on your jobsite.

Attached are subcontractor safety violation notification forms. Please complete (if necessary) and return to the Safety Director or complete on iPad.

Notification of an Unsafe Condition

COMPANY IN VIOLATION: **JOB NAME AND LOCATION:**

_____ _____

_____ _____

_____ _____

Please be advised that we have observed the following unsafe conditions, or unsafe acts, of your employees. This situation is creating a hazardous condition and could result in personal injury.

_____

_____

_____

We strongly encourage you to correct these conditions immediately before an accident occurs. We are all responsible for the safety and health of our employees under OSHA 1926 Construction Standards.

Thank you for your cooperation concerning our recommendations. We will continue to monitor all work activities at our jobsites to assure a safe work environment for all employees.

_____ **Date:**
(Conewago Official)

_____
(Subcontractor Representative)

cc: Copies of this document must be sent to the affected subcontractor/supplier, the Safety Office and to the job office file.

Duties and Responsibilities

Employee

The term " Employees" as referred to in this handbook refers collectively to all *Conewago. Employees, its contractors, subcontractors, and their Employees working at the Job Site.*

1. All employees shall learn and comply with all safety rules, policies, and regulations applicable to their work.

2. Work safely in a manner as to ensure their safety as well as the safety of those around them.

3. Report all safety and health hazards to supervisors and take necessary actions to establish an immediate temporary control of the hazard until permanent control can be established.

4. Immediately report all accidents, incidents and near misses occurring on the job to their supervisor.

5. Attend and participate in all required safety training and meetings.

6. Maintain and utilize all personal protective equipment provided.

7. Follow all safety rules.

Subcontractor Safety Policy

This document informs interested people, including employees, that our facility has developed a procedure to transmit safety information both from the company to contractors and their workers and from contractors and their workers to this company. Common sense and safety concerns encourage standardization of these communications. These procedures standardize information transfer to make sure that all concerned have the information they need to work safely.

Purpose

A written contractor safety policy establishes guidelines to be followed for contractors working at/for our company. The rules established:

- Provide a safe working environment.
- Govern facility relationships with outside contractors.
- Ensure that contractor employees and our employees are trained to protect themselves from all potential and existing hazards.

The effectiveness of the contractor safety program depends upon the active support and involvement of all employees. This plan is intended to implement a program to ensure that all contractor work practices are carried out safely to minimize the possibility of injury or harm to the contractors' employees or our own employees. It is intended to serve as an additional tool in safeguarding the health and safety of employees.
The contractor safety policy establishes uniform requirements designed to ensure that contractor safety orientation, coordination, and safety administration practices are communicated to and understood by employees.
This document is provided to ensure all company safety plans, policies and procedures are communicated to all participating contractors. It also provides an avenue for contractors to communicate their safety plans, policies, and procedures to the company. This program aims to prevent personal injuries and illnesses.

Administrative Duties

The Safety Director is responsible for developing and maintaining the program. Employees may review a copy of the plan. It is located in the Safety Director’s office and on the Conewago website. The assistant to the Project Manager is responsible for maintaining any records related to the contractor safety program.
If after reading this program, you find that improvements can be made, please contact the Safety Director. We encourage all suggestions because we are committed to the success of our contractor safety program. We strive for clear understanding, safe behavior, and involvement from every level of our company.

Explanation Of Responsibilities

Company Responsibilities

This company has specific safety responsibilities when hiring contractors to come onto the worksite, onto the grounds, or into the buildings or facilities to perform work. Company responsibilities when hiring contractors include the following listed steps. The company will:
1. Take steps to protect contract workers who perform work on or near a potentially hazardous process.
2. Obtain and evaluate information regarding the contract employer's safety performance and programs.
3. Inform the contractor of known potential fire, explosion, or toxic release hazards related to the contractor's work and the process.
4. Explain the applicable provisions of the emergency action plan to the contractor and require that the contractor disperse that information to all workers who will work at this site.
5. Develop and implement safe work practice procedures to control contract employees' entry into hazardous work areas.
6. Maintain a contract employee injury and illness log (temporary employees only).
7. Periodically evaluate the contract employer's fulfillment of his or her responsibilities under this policy.
8. Hire and use only contractors who meet Contractor Selection Criteria as listed in the next section of this policy.

Contractor Responsibilities

Contract employees must perform their work safely. Considering that contractors often perform very specialized and potentially hazardous tasks, such as confined space entry activities and non-routine repair activities, their work must be controlled. Contractor responsibilities when accepting contracts with this company include the following listed steps. The contract employer will:

1. Assure that the contract employee is trained in the work practices necessary to safely perform his or her job.
2. Instruct the contract employee in the potential fire, explosion, or toxic release hazards related to his or her job and the process.
3. Assure that the contract employees know the applicable provisions of the emergency action plan.
4. Document contract employee training.
5. Inform contract employees of and then enforce safety rules of the facility, particularly those implemented to control the hazards of the contracted process during operations.
6. Require that all subcontractors abide by the same rules to which this section binds the contractor.
7. Abide by the facility smoking rules. Smoking is prohibited in certain areas of some facilities. Therefore, permission must be requested before the contractor's employees are allowed to smoke in any area.

Guidelines For Contractor Safety

The following listed steps are the standard procedures for evaluating and choosing contractors who will work on-site at this company.
Obtain and evaluate information regarding a contractor employer's safety performance and programs when selecting a contractor to perform any type of contract work that

might bring them into contact with any hazardous chemical or process on the premises of this company.
To determine that past safety performance, the group or individual selecting the contractor should consider the contractor's:

- Employee injury records such as Experience Modification Rate (EMR or MOD) for workers' compensation for the past three years and the contractor's past safety record in performing jobs of a similar nature.
- OSHA log, which includes the injury and illness rates (number of lost-time accident cases, number of recordable cases, number of restricted workday cases, number of fatalities) for the past three years.
- Incidence rates for lost-time accidents and recordables for the past three years.
- Written safety program and training system.

For contractors whose safety performance on the job is not known, obtain information on injury and illness rates and experience and obtain contractor references.
Contractor work methods and experience should be evaluated. Ensure that for the job in question the contractor and its employees have the appropriate:

- Job skills.
- Equipment.
- Knowledge, experience, and expertise.
- Any permits, licenses, certifications, or skilled trades people necessary to be capable of performing the work in question.

The contractor must be willing and able to provide a current certificate of insurance for workers' compensation and general liability coverage with the contracting company.
Each contractor must be responsible for ensuring that its employees comply with all applicable local, state, and federal safety requirements, as well as with any safety rules and regulations set forth by this company, at which it is performing the contracted work.
Possible ways to determine past compliance with such safety regulations include:

- Requesting copies of any citations for violations occurring within the last three years, to determine the frequency and type of safety laws violated.
- Having all bidders on jobs describe in detail in writing any safety programs in place at the contractor, infractions, accidents, and workers' compensation claims within the last three years. This information will provide the company with a solid background on that contractor's safety performance and adherence to safety rules and regulations.

Guidelines For Information Exchange

Company Guidelines for Information Exchange

Before contract work begins, this company must:

1. Designate a representative to coordinate and communicate all safety and health issues and communicate with the contractor. The designated representative will have a copy of the work document, be thoroughly familiar with its contents, and with the safety and health aspects of the work or know whom to call to obtain this information. The designated representative is responsible for ensuring that all company responsibilities listed below are carried out.

2. Provide a copy of the facilities written safety policies and procedures to the contractor.
3. Inform the contractor of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be given the telephone numbers of the nearest hospital, ambulance service, and fire department.
4. Conduct an inspection of the proposed worksite area before the pre-start-up meeting so any known information about on-site hazards, particularly nonobvious hazards, are documented and thoroughly communicated to the contractor.

5. Work directly with the contractor's designated representative, with whom all contact should be made.
6. Conduct a pre-start up meeting (walk-through) with the contractor's designated representative and a supervisor from each of the areas of the plant involved in the contractor's work.
7. Review all contract requirements related to safety and health with the contractor's designated representative, including, but not limited to, rules and procedures, personal protective equipment (PPE), and special work permits or specialized work procedures. Advise the contractor that the facility safety and health policies must be followed. A copy of the facility's safety plans must be furnished to the contractor.
8. Inform the contractor’s designated representative of the required response to employee alarms and furnish the contractor with a demonstration or explanation of the alarms.
9. Communicate thoroughly with the contractor's designated representative any safety and health hazards (particularly no obvious hazards and hazard communication issues) known to be associated with the work, including those in areas adjacent to the worksite. Tell them it is the contractor's responsibility to convey this information to its employees.
10. Review preparation of worksite before contractor begins initial work.
11. Identify connect-points for all services, such as steam, gas, water, electricity, etc. Define any limitations of use of such services.
12. Ensure that all affected employees at this company receive training on all hazards to which a contractor will introduce them.

During the contract work, this company must:

1. Limit, as necessary, the entry of company employees into contractor works areas.
2. Monitor the contractor's compliance with the contract throughout the duration of the work. When checking contractor work during the project, note any negligent or unlawful act or condition in violation of safety standards or requirements. Any items noted should be brought immediately to the attention of the contractor's designated representative in writing, with a copy of the notice being sent to the contractor's home office concurrently. However, if an unsafe act or a condition is noted that creates an imminent danger of serious injury, immediate steps should be taken with the contractor's designated representative, or in his or her absence, the contractor's employees to stop the unsafe act or condition. Do not allow work that is in violation of a regulation to continue.
3. Document all discussions, including place, time, and names of contractor employees in attendance.
4. Approve the contractor beginning work each day unless it is routine service or maintenance work or periodic outdoor service or maintenance work.
5. For work for which this company has developed specific and generally applicable procedures, make sure contractors and their subcontractors follow the same procedures.

6. Do not allow loaning of tools and equipment to outside contractors and their subcontractors. The contractor is required to provide the necessary tools and equipment.
7. Contact the nearest medical facilities, when available, in emergency situations where severity of the injury dictates immediate attention.
8. Obtain a copy of each OSHA recordable injury report from the contractor and subcontractor. Investigate and report to the facility manager all personal injuries to contractor and subcontractor employees.
9. Investigate and report any property losses. Maintain a contractor accident report file.
After conclusion of the contract work, The Maintenance Supervisor completes a post-project assessment of the contractor's safety performance for the facility manager to be used for future reference, with a recommendation on whether or not to re-hire the contractor.

Contractor Guidelines for Information Exchange

Before the contract work begins, the contractor must:

1. Designate a representative to coordinate all safety and health issues and communicate with this company's designated representative.
2. Provide documentation of any necessary safety training, as described in the Training Requirements section of this policy, to this company's designated representative.
3. Sign a confidentiality statement to protect this company's proprietary data.
4. Provide information to the designated representative on the safety and health hazards that may arise during the course of the contractor's work at this company and the means necessary to avoid danger from those hazards, including Hazard Communication and all other potential hazards.
5. Obtain from this company any safety rules and regulations in effect at the site or potential hazards present that may affect the contractor's work.
6. Be certain to be informed of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be certain to have the telephone numbers of the nearest hospital, ambulance service, and fire department.
7. Advise and train its employees on hazards associated with the work to be performed, including any Hazard Communication or other hazard information provided to the contractor by this company's designated representative.
8. Keep the designated representative of this company fully informed of any work which may affect the safety of this company's employees or property. This includes complying with the state and federal right-to-know legislation and providing the designated representative appropriate material safety data sheets (MSDSs) or other required information about chemicals the contractor will bring onto the site.
9. Know who to call and what to do in emergencies, including where first aid and medical services are located and train employees on this.

During the contract work, the contractor will:

1. Have a designated site safety coordinator present and attentive to the work being carried out at all times that the contractors and/or subcontractors are working at the facility site.
2. Ensure that all subcontractors are abiding by the terms of this plan.
3. Perform its work while the plant is operating, if necessary, and establish necessary safe practices to permit work under operating conditions without endangering this

company's associates and property. This includes but is not limited to barricading, signposting, and fire watches.
4. Make sure that any equipment, chemicals, or procedures used by the contractor to perform contracted work meets all OSHA requirements.
5. Be held responsible and accountable for any losses or damage suffered by this company and/or its employees as a result of contractor negligence.
6. Provide its employees with medical care and first-aid treatment. Plant first-aid facilities may be used only in case of emergencies.
7. Use only the plant or building entrance designated and follows the facility access control practice. The contractor will also ensure that each contractor employee is issued and wears some form of easily seen identification.
8. Provide supervisors and employees who are competent and adequately trained, including training in all health and safety aspects of the work involved in the contract.
9. Provide all tools and equipment for the work, including personal protective equipment (PPE), and ensure the equipment is in proper working order and employees are instructed in its proper use.
10. Maintain good housekeeping in the workplace.
11. Follow specific instructions supplied by this company should emergency alarms be activated.
12. Notify the designated representative immediately of any OSHA recordable injury or illness to contractor employees or subcontractor employees occurring while on the site of this company. Provide a copy of each accident report to the designated representative.
13. Receive and use a copy of the facility's written safety policies and procedures.
14. After conclusion of the contract work, the contractor is responsible for cleaning all work areas and disposing of any discarded materials in a proper and legal manner.

Training Requirements

Company Requirements

Conewago makes sure that affected company employees receive training on all hazards to which a contractor will introduce to them.
In addition, we emphasize to the contractor that it is the contractor's responsibility to convey to its employees any safety information provided by the company to the contractor.

Contractor Requirements

The contractor must:

1. Train all workers on all safety and health hazards and provisions applicable to the type of work being done and provide documentation of such training to this company's designated representative.
2. Train employees in where to obtain first-aid and medical services.

Record keeping Requirements

Company Requirements

The designated representative will:

1. Have a copy of the contract on file and be thoroughly familiar with its contents, and with the safety and health aspects of the work.
2. Keep records of all training done with company workers regarding hazards to be caused by the contracting company.
3. Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.
4. Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur in the course of the project.
5. Keep a daily log regarding prework start-up inspection findings.
6. Keep records of all documentation of any sort given to you by the contractor, including records of training done, MSDSs, accident reports, etc.
7. Keep records of all documentation of any sort you give to the contractor, including a list of hazards to train their employees on, MSDSs, etc.
8. Document all discussions, letters, memos, or other communications made to the contractor regarding safety issues, including place, time, names of people involved.

Contractor Requirements

The contractor will:

1. Keep records of all training done with contract workers and all documentation provided to the contracting company regarding such training.
2. Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.
3. Have on file the telephone numbers of the nearest hospital, ambulance service, and fire department.
4. Have copies on-site of all material safety data sheets (MSDSs) or other required information about chemicals relevant to the work on-site.
5. Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur in the course of the project.

Duties and Responsibilities

Subcontractor Job Site Safety Coordinator

Each subcontractor shall designate a Job Site Safety Coordinator who must establish a working relationship and maintain contact with members of Conewago's Job Site team.

The Jobsite Safety Coordinator for each subcontractor must provide proper documentation that he/she has been recognized by their employer as a Competent and /or Authorized Person as appropriate. Documentation shall be provided in writing to the Conewago Enterprises Safety Director prior to the beginning of work onsite.

The Job Site Safety Coordinator must be aware of potential hazards and the steps taken or to be taken to mitigate such hazards. They must ensure that appropriate personal protective equipment is available and utilized and that work practices be modified, where necessary, to protect Employees.

The Job Site Safety Coordinator must also ensure that all of their employees comply with applicable safety and health rules and regulations. **See Appendix 1 on next page**.

Weekly tool-box safety meetings and daily huddles will be conducted for all employees while working at the Job Site. Each Job Site Safety Coordinator will be responsible for ensuring that all of their employees are present and have signed the attendance document. The document shall have the signatures of all those in attendance.

It is the responsibility of every Job Site Safety Coordinator to notify the Conewago Safety Director in the event of injury to any person at the Job Site and prepare and submit an incident report or other appropriate documentation to the Conewago Safety Department. The Job Site Safety Coordinator may be requested to participate in any incident investigations required.

SubContractor Safety Rules

Appendix 1 **Safety Manual**

1. Willful and or repeated violations of Safety Rules or unsafe work practices will not be tolerated. Safety rules of Conewago and standards set by federal, state, and local governmental agencies must be followed.
2. Each Subcontractor Supervisor/Foreman shall attend a weekly site safety meeting conducted by the site superintendent.
3. Each Subcontractor shall conduct a Weekly Safety Meeting with their employees as well as have their employees attend the Weekly Toolbox talks and daily safety huddles conducted by Conewago. Additionally, each Subcontractor shall conduct weekly jobsite Safety Audits and document the results.
4. Maintain good housekeeping at all times by continuously monitoring work areas. Waste, debris, and rubbish, including lunch paper, cups, cans, and other litter, must be deposited in closed containers. Oily rags, waste and similar combustible materials must be discarded in properly labeled metal containers.
5. Personal Protective Equipment (PPE) shall be worn on all operations where there is exposure to hazardous conditions or where the use of such equipment is required by the hazard. Class 2 high visibility vest or T-shirts are required on Conewago projects. This also applies to visitors.
6. Approved hard hats and safety glasses (Z87.1-1968) with side shields must be worn while in the construction area or any other designated areas. Any employee performing activities that require the use of an abrasive wheel grinder, e.g. portable hand grinders or permanently mounted table grinders, shall wear a full-face shield over their safety goggles. Protective toe, laced, leather work boots (hard soles) are required for foot protection (Z41.1-1991) (See item 29). Proper/task appropriate gloves must be worn at all times while performing such task.
7. Any worker exposed to a fall potential of 6 feet or greater shall be properly protected by one of these methods of guardrails, covers, safety nets, or personal fall arrest systems. Fall protection for “roofers” and “other trades” performing work on a roof or working from roof’s surface shall follow the OSHA fall protection standards, requirements and safety work procedures required for those specific trades. Note: roofers and other trades do not share the same fall protection standards. **Safety monitor fall protection systems are prohibited.**
8. All scaffolds must be assembled and inspected according to OSHA regulations. Inspection tags will be monitored for completion daily.
9. All injuries and near misses, no matter how slight, must be reported to Conewago’s Superintendent immediately.

10. Report all unsafe practices and conditions to your Supervisor/Foreman at once. All site personnel are encouraged to remind other personnel with regard to safety infractions.
11. Compressed air shall not be used to "dust off" clothes or the body. Cleaning of concrete or concrete forms with compressed air is prohibited. All tasks that present a risk of silica exposure shall be followed as addressed in the subcontractor's Silica policy. (Submitted for approval before work begins).
12. Submitting false or fraudulent information regarding an accident or injury shall not be permitted.
13. Shirts or T-shirts with 3-inch sleeves and long pants are required.
14. Only authorized and properly trained personnel are permitted to operate company vehicles, equipment, valves, electrical switches and similar equipment.
15. Maintain all machinery guards, guardrails, seat belts, and other safety protection devices in proper working condition.
16. Obey all warnings and traffic signals at all times and park in designated employee parking areas.
17. No person other than the authorized operator is allowed to ride on any piece of equipment that is not equipped with a seat and seat belt for passengers. Transporting passengers in the rear of dump trucks, on tractors, forklifts, or similar equipment is prohibited. Passengers riding in the bed of pickup trucks is prohibited.
18. Employees shall not ride loads, slings, balls, crane hook, or other material hoisting equipment.
19. All operators of Boom Trucks used to deliver materials to a Conewago construction site must be prepared to show their NCCCO crane license per OSHA 29 CFR 1926 Subpart CC.
20. When working in proximity of electrical or mechanical equipment circuitry, appropriate lockout or tagging devices shall be placed to identify all controls that deactivate the circuit and the circuit shall be locked out. No work is allowed on energized electrical parts or panels.
21. Ground-fault circuit interrupters (GFCIs) shall be used on all wiring systems (including generators and welders).
22. Damaged or defective tools and equipment shall be removed from service and tagged "Unsafe-Do Not Use." All electrical cords shall be inspected per the Conewago Safety Policy.
23. Store and use compressed gas cylinders in a secured and upright position. Oxygen and acetylene must be stored 25 feet apart or be separated by a firewall.
24. SDS sheets must be available for all hazardous materials brought on site. All containers with hazardous materials shall be properly labeled and stored according to SDS sheets.
25. All fire protection and emergency equipment for emergency use shall be plainly marked and must be kept free of obstructions. Tampering with or unauthorized removal of fire extinguishers from assigned locations shall result in disciplinary action.

26. The manufacture, possession, sale or use of illegal substances and alcohol in the workplace is prohibited. The Company reserves the right to bar from the site any employee convicted of a criminal drug offense in the workplace. All employees must abide by the provisions of the Federal Drug-Free Workplace Act of 1988.
27. Carrying firearms or explosives on the job site without proper company authorization or other violation of any local, state, or federal law on company premises is prohibited.
28. Fighting, gambling, horseplay, threatening another worker or any other type of misconduct will not be tolerated.
29. Smoking is not permitted in designated "No Smoking" areas, nor in areas where flammable or combustible materials are stored.
30. Misuse or willful destruction of property or equipment will not be tolerated.
31. Rules of Conewago which exceed OSHA minimum requirements are as follows:
    - Fall prevention and/or protection devices are required for all work activities above 6 feet.
    - Hard hats and safety glasses with side shields are required at all times.
    - Safety toed boots must be worn while on the work site.
    - Task appropriate gloves must be worn while on the work site.
    - Personal fall arrest and restraint systems shall be utilized when occupying any type of aerial lift (including scissor lifts).
    - No employee shall be permitted to ride on mobile scaffolds.
32. Conewago highly recommends that cell phones not be used when performing tasks requiring full attention (operating lifts, etc.) and therefore may restrict the use of cell phones to Official Supervisory Personnel only. Official Supervisory Personnel will normally consist of those Supervisors and Foreman required to conduct business as usual and anyone required to respond during serious injury or emergency situations.
33. Each subcontractor is required to provide a person who has a valid certificate in First-Aid training available at the worksite to render First-Aid. Each subcontractor shall provide a blood borne pathogen kit at their designated First-Aid treatment location.
34. Conewago will have a Conewago supervisor or foreman on site anytime a subcontractor is performing their scheduled work. Subcontractors are required to have their competent person on site when their employees are on site working. When the sub of a sub has an employee(s) working, the "prime" subcontractor shall have their competent person or foreman on site during all scheduled work shifts.

Duties and Responsibilities

Safety Director

1. Provide all levels of management with the services needed for the proper administration of training and safety programs.

2. Formulates, recommends, and administers approved changes to accident prevention programs.

3. Prepares and distributes status reports on safety.

4. Maintains an adequate accident report system.

5. Personally investigates serious accidents and incidents; when appropriate, takes corrective action to eliminate the causes.

6. Cooperates with project management personnel in the safety training needed for their work crews.

7. Maintains outside professional contacts.

8. Ensures there is full compliance with all applicable federal, state, and local safety regulations.

9. Recommends programs and activities that will motivate and provide incentives for employees to work safely.

10. Recommends disciplinary procedures for repeat offenders of safety rules.

11. Reports directly to the officers of the company and is under the direct supervision of the company president and VP of Risk Management.

12. Jobsite safety audits are performed by the Field Safety Managers and filled out on an iPad. Field Safety Managers then email this report to the safety department, Project Managers, Superintendents, subcontractors, and Vice President of Risk Manaagement for their review.

Duties and Responsibilities

Safety Committee Guidelines

1. Meetings of the Safety Committee will be held on a monthly basis (generally the 3rd Friday of each month, beginning at 3pm for CEI and the 3rd Thursday of each month, beginning at 2:00 pm for MFG).

2. The Safety Director or Safety Committee chair will be responsible for reviewing a summary of all accident reports for the previous month and submitting them to the Safety Committee during the monthly meeting.

3. The Safety committee will discuss all accidents submitted and discuss and assign corrective actions in an effort to prevent the same accidents in the future.

4. The results of selected jobsite inspections made by the safety department or selected committee members will be reported to the Safety Committee body for review at the next scheduled meeting.

5. Committee members are encouraged to report any unsafe condition to the Safety Director. The Safety Director will investigate and report back to the committee with a disposition.

6. A Safety Committee representative will be responsible for the meeting agenda and minutes.

7. The following documentation of Safety Committee activities will be filed electronically at U:\Safety.

   Agendas.
   List of committee members and attendance at meetings.
   Accident Report Log.
   Any management response to committee reports.

8. Committee members will serve at least one full year on the committee with at least one experienced committee member serving at any one time.

9. At a minimum, the safety committee will consist of 2 management and 2 field/shop representatives.

OSHA
Jobsite Requirements

A. OSHA jobsite requirements

1. Provide a copy of OSHA regulations for construction to supervisory personnel.

2. Post at each workplace:
    a. OSHA poster
    b. List of emergency telephone numbers (Fire Department, Police and Rescue Squad)

B. Maintain records required by OSHA at jobsite and/or central location.

C. Immediately inform the Safety Director of all OSHA visits, inspections, and communications relating to inspections.

D. Provide a first-aid kit to each jobsite.

E. Arrange for ambulance and medical service at each jobsite.

F. Advise the Safety Director of any requests for variance to OSHA standards.

Accident Reporting and Record Keeping

Purpose:

Accident, injury, and illness reports are required by various federal and state laws. Accident reports are also required by our company insurance carriers.

Policy:

It is the policy of Conewago to create, maintain and file accident reports as required by law.

All incidents and accidents resulting in property damage, or injury and causing illness to employees (including near-misses) shall be reported in order to:

- Establish a written record of factors that cause injuries and illnesses and occurrences (near misses) that might have resulted in injuries but did not, as well as property and vehicle damage.
- Maintain a capability to promptly investigate incidents and events in order to initiate corrective and/or preventative action.
- Provide statistical information for use in analyzing all phases of incidents and events.
- Provide the means for complying with the reporting requirements for occupational injuries and illnesses.
- The accident/incident reporting system requirements apply to all incidents involving company employees, on-site vendors, subcontractor employees and visitors where personal injury, illness and/or property damage is involved.

Responsibilities

<u>Management:</u>

Establish and maintain an effective accident reporting system.

Establish and maintain an effective record keeping program including security controls over sensitive employee medical and exposure records.

Train all supervisors and foremen on accident reporting procedures.

Report any accident involving a fatal injury, or injury to 5 or more employees, to OSHA within 24 hours.

Train record custodians in proper record entry, maintenance, and release procedures.

Conduct an annual program audit.

Supervisors:

Comply with the requirements of this program.

In the event an accident involves serious injury or substantial financial loss, all efforts shall be taken to record events, photograph the scene, identify witnesses, and preserve the scene until investigators can respond.

Employees:

Comply with accident reporting procedures.

Incidents (Occupational Injuries and Illnesses)

Injuries and illnesses that require reporting include those injuries and illnesses occurring on the job which result in any of the following: lost work time, restrictions in performing job duties, requirement for first aid or outside medical attention, permanent physical bodily damages, or death. Examples of OSHA recordable injuries include, but are not limited to, heat exhaustion from working in hot environments, strained back muscles from heavy lifting, acid burns on fingers, etc.

Other incidents requiring reporting include those incidents occurring on the job which result in any of the following: injury or illness, damage to a vehicle, fire/explosion, property damage or hazardous chemical spills.

Examples of “non-recordable” injuries and illnesses include small paper cuts, common colds and small bruises not resulting in work restrictions or requiring first aid or medical attention.

Near-misses

Other incidents that, strictly by chance, do not result in actual or observable injury, illness, death, or property damage are required to be reported. The information obtained from such reporting can be extremely useful in identifying and mitigating problems before they result in actual personal or property damage. Examples of near miss incidents required to be reported include the falling of a compressed gas cylinder and overexposures to chemical, biological or physical agents (not resulting in an immediately observable manifestation of injury or illness).

Incident Reporting Procedures

The following procedures are to be followed by all employees in order to effectively report occupational injuries and illnesses and other incidents or events. All reports to outside agencies (OSHA, EPA, etc.), except for those to local emergency response units (police, fire, ambulance), shall be made at the direction of a company officer.

Incidents (Injuries and illnesses)

Serious injury and illness posing a life-threatening situation shall be reported immediately to the local emergency response medical services.

Injuries and illnesses shall be reported by the injured or ill employee, to his or her supervisor in person or by phone as soon after any life-threatening situation has been addressed. If the injured employee is unable to report immediately, then the incident should be reported as soon as possible.

Upon notification of an occupational injury or illness, the supervisor must complete the Incident/Accident report and submit it to the Safety Department. The incident/accident form will be reviewed by the Safety Director. At this time, further investigation of the incident/accident may be warranted. The Safety Director will forward a copy of the original report, along with any later findings, to the Risk Manager.

Events (Near Misses)

Incidents not involving injury or illness, but resulting in property damage, must also be reported within 24 hours of the incident. In cases of fire or explosion that cannot be controlled by one person, reported vehicular accident, or a chemical release involving a reportable quantity or requiring evacuation, the involved party must immediately report the incident to the emergency response services in the area (police/fire).

All near miss incidents must also be reported on the appropriate Near Miss form within 24 hours of occurrence. In place of indicating the result of the accident (i.e., actual personal injury or property damage) the reporting person shall indicate the avoided injury or damage.

Events, hazardous working conditions or situations and incidents involving subcontractor employees must be reported to the Safety Director immediately.

Recordkeeping

The Safety Director will maintain the Log of Work-Related injuries and illnesses (OSHA Form 300), the Summary of Work-Related Injuries and Illnesses (OSHA Form 300A), and the Injury and Illness Incident Report (OSHA Form 301) fir each calendar year.

The Summary of Work-Related Injuries and Illnesses (OSHA Form 300A) will be posted annually throughout Conewago facilities from February 1st to April 30th each calendar year.

Training

Employees shall be trained in incident reporting requirements and be made aware of their responsibilities pertaining same. New employee orientation training includes information of reporting incidents and accidents. Employees involved in record entry and record keeping will be trained in company and statutory requirements.

Program Audits

Periodic reviews and audits shall be conducted to confirm that all employees are familiar with the incident reporting program and that the program is managed properly.

Audits will consist of:

- Annual review of accident reports to ensure all records have been maintained and are complete.
- Annual review of the program with company insurance carriers and workers compensation third party.
- Annual refresher training.
- The investigation of any accident may be assigned to and controlled by outside counsel. In these circumstances, the above policies and procedures may be modified at counsel's direction.

Workplace Violence and Security

Conewago is committed to maintaining a safe, healthful, and efficient working environment where customers and employees are free from the threat of workplace violence.

In keeping with this policy, “Conewago” prohibits any employee from engaging in any act, either on company premises or during the performance of work-related duties, that:

Threatens the safety of an employee or customer.

Affects the health, life, or well-being of an employee and/or customer.

Results in damage to company, employee, or customer property. **Such**

acts include, but are not limited to:

Threatening, intimidating, coercing, harassing, or assaulting an employee or customer.

Sexually harassing an employee or customer.

Carrying concealed weapons on company property or concealing a weapon on company property or jobsites. “Weapons” include (but not limited to) guns, knives**,** explosives, or any other item with the potential to inflict harm.

Absolutely no firearms are permitted on company property or jobsites.

Allowing unauthorized persons access to company buildings without management permission.

Using, duplicating, or possessing keys to company buildings or offices within those buildings without authorization.

Stealing, or attempting to steal, property of the company, an employee, or customer.

Damaging, or attempting to damage, property of the company, an employee, or customer.

Reporting and Investigation Procedures

Any employee (including a supervisor or manager) who has been threatened, is a victim of a violent act, or learns of any threats or violent acts, is to report such activity to Human Resources or the Safety Director immediately. Each report will be promptly evaluated and investigated to determine what follow-up actions are necessary.

Confidentiality:

Information about an incident or threat will be disclosed on a need-to-know basis only, so that a fair and thorough investigation can be conducted and/or appropriate action can be taken. Every effort will be made to ensure the safety and privacy of the individuals involved.

Discipline:

An employee who engages in prohibited conduct will be subject to appropriate disciplinary action. Such discipline may include verbal warnings, written reprimands, suspension, or immediate termination. In addition, certain actions may cause the employee to be held legally liable under state and/or federal law.

No Retaliation:

Episodes of workplace violence can only be eliminated if employees are willing and able to report threats, violent acts, and other unsafe conditions without fear of retaliation. To encourage employees to come forward without the fear of retaliation, Conewago promises to promptly investigate all complaints of retaliation, and impose appropriate disciplinary action, up to and including termination.

In the event of an assault:

- Do not approach the aggressor if he/she remains on the scene.
- Assess the situation.
- Determine if an immediate emergency (fire/ambulance/police) response is warranted.
- Remove yourself from any danger.
- Contact the appropriate authorities (Company officials, Law Enforcement, First Responders, etc.)
- If the incident has potential to further endanger persons or property, activate the company emergency action plan.
- If the aggressor has left the scene or no longer poses a threat, attend to the injured by summoning available on-site emergency responders. Notify the appropriate authorities and remain available for debriefing.
- Secure the work area (including locking down the building) where the disturbance occurred. Assess the work area to ensure it is safe to remain at that location (is there danger of fire, explosion, etc.).
- If the incident does not warrant the activation of the Emergency Action Plan, non-essential personnel should return to their workstations until instructed otherwise.
- Account for all employees, visitors and others and ensure the physical safety of those remaining.
- Provide accurate communication to outside agencies (law enforcement, EMS). Refer all requests for information from the media to Human Resources.

Discipline

Conewago Enterprises, Inc., Conewago Manufacturing, LLC, and Conewago Holdings, Inc. have established a progressive discipline policy to deal with violations of our safety rules.

This policy has been developed to encompass ALL employees, including supervisory personnel. As a company, we treat any infraction to our safety policy as serious. As such, we reserve the right to discipline or immediately dismiss any employee who commits a serious infraction or is a habitual offender. The degree of discipline will depend on the severity of the infraction, prior safety and disciplinary history, work history and the specific circumstances. Discipline may include verbal or written warnings, suspension without pay or termination.

Obviously, when employee misconduct occurs, measures must be undertaken to correct the situation and to curtail further occurrences, for the good of us all. The approach we take to discipline may vary depending, at our discretion, based on the gravity of the offenses, the circumstances under which it occurred, your duties, your length of service (seniority) with our company, and your overall work record, including any prior misconduct, among other things. In order of severity, discipline can take one of the following forms:

- Documented Verbal Counseling
- Written warning or reprimand.
- Probation
- Suspension, subject to discharge
- Discharge

Keep in mind that our company has no obligation to use any one or more of these forms of discipline prior to discharging an employee. Any or all of these steps can be omitted, as the company deems appropriate, at its discretion. Moreover, by establishing this disciplinary procedure the company is not relinquishing or limiting its managerial right to discharge for any reason, at any time, with or without notice.

The use of progressive discipline as a pre-condition to termination is discretionary, in our company's judgment. The company's decision in every case is final and binding on all concerned, including the disciplined employee and all other persons or entities involved in any way, directly or indirectly.

Training

All new employees complete training in forklift and aerial lift basics, driver safety, and OSHA required topics as they relate to Conewago operations before being assigned. New employees will complete an OSHA 10-hour course at the beginning of the following year of their hire date. All Foremen, Superintendents, and Supervisors compete an online OSHA 30-hour course.

All employees are trained on all OSHA required topics through weekly toolbox talks. In addition, MFG plants are trained monthly by the company's certified OSHA trainer. Task specific training is completed with a certified trainer in the field of specialty as needed and appropriate. Toolbox talks also contain information on relevant topics as appropriate, as well as weekly updates on incidents based on reporting sources.

Apprentice training and leadership type training are assigned as appropriate.

Yearly Foremen and Superintendent training is scheduled with a relevant agenda to include updates on company policy and Federal Regulations.

All first responders are trained bi-annually on First Aid, CPR and AED use. Any forklift or equipment certifications are completed as required.

Bloodborne Pathogens

There are many communicable diseases that can be contracted on and off the workplace – we need to be aware of what they are and how to prevent them. The most dangerous diseases that need to be discussed are:

Hepatitis: Can be contracted by blood contact and is highly contagious. **Herpes**: Can be contracted by any fluids or secretions from the body.

Meningitis: Can be contracted from secretions or body fluids, especially from the nose or mouth (by coughing, for instance). Some forms of Meningitis bacteria can be transmitted.

Tuberculosis: Although not highly contagious, it can be transmitted through droplets and sputum coughed from a person who has the disease.

AIDS (Acquired Immunodeficiency Syndrome): This disease can be transmitted through any body secretions, but more likely through the blood or any secretion containing blood.

Prevention of contact with those and other communicable diseases should include the following:

Gloves: Gloves are probably the most important prevention that can be used for you on the worksite. Latex gloves are provided in all first aid kits supplied on jobsites. They offer protection against bodily fluids that you could come into contact with while helping someone, especially someone with gross bleeding. If gloves are immediately available, a piece of plastic wrap, or even multi-layered dressings or cloth is acceptable to provide a barrier between you and the other person. Keep in mind that if dressings or cloths are applied to wounds to control bleeding, do not remove them if they become blood soaked. The correct procedure is to apply more dressings on top as needed and apply pressure.

CPR Masks: Each first aid kit is provided with a disposable CPR mouth-to-mouth barrier protector. These devices should be used by people who are properly trained in CPR to protect themselves from possible contamination from oral secretions. The protruding white plastic tube should be placed in the person's mouth and the plastic barrier will lay over the mouth. There is a plastic check valve in the tube to prevent any secretions from coming in contact with you. These masks should be discarded when you are finished with them.

Goggles: Another safety measure is to wear some type of eye protection, such as glasses or goggles, to protect you from getting any type of body fluids in your eyes, especially while performing ventilation CPR.

All contaminated surfaces will be properly cleaned by a first responder trained on proper cleaning of work surfaces that have been exposed to blood or bodily fluids.

All preventative measures, training, and exposure control is available to all employees. A copy of this plan is available to all employees upon request.

Some final notes on the awareness of protection from bloodborne hazards:

You have no way of knowing whether or not a person has a communicable disease, and the law states that they have their right to privacy—they do not have to tell you that they have a disease. The base way to handle this is to protect yourself EVERY TIME there is a choice you may come into contact with someone who you are assisting with bleeding, sickness, injury. This is known as Universal Precautions.

Although you are not legally obligated to assist someone, morally it is the right thing to do. If you take some simple precautions as described above, the risk of infection becomes minimal.

Being in a situation where you are going to assist someone is awkward enough, and with the fact that you are going to take precautions such as gloves, masks, etc., some people may ask, "Why are you doing this, don't you trust me?" A simple yet straight forward response to this is, "How do you know I don't have a disease?"

All WWTP site employees must have the Hepatitis B Vaccine offered to them as a precaution.

All First Responders have the Hepatitis B vaccine offered at the time of training.

All employees are trained in Bloodborne Pathogens yearly as required by OSHA regulations and referenced in the **TRAINING** section of this manual.

Employees that have been exposed or at risk of exposure should wash their hands thoroughly immediately after caring for another person or responding to an injured employee. Potable water and soap or antiseptic hand cleanser is available in the job trailer, portable plant control room, Foremen company trucks and portable toilets.

Employee Drug and Alcohol Abuse

Statement of Intent

It is in the interest of the entire Conewago Enterprises, Inc. and Conewago Manufacturing, LLC (hereinafter referred to as “Conewago” or “Company”) to maintain a workplace which is free from the presence of alcohol, drugs, or other intoxicating substances and free from the impairments associated with alcohol or drug usage. Concerns with respect to employee safety, employee health, product quality, and corporate competitiveness require that Conewago take an active approach to the resolution of suspected or identified substance abuse situations. In so doing, Conewago recognizes the right of employees to be free of unreasonable intrusion into their private affairs, and the need, where practical, to offer assistance to employees in resolving their problems.

Philosophy

In order to protect its interests as a company and the safety of its employees, Conewago must maintain and enforce rules and regulations. The company will discipline employees for violation of its policy on drug and alcohol or for other appropriate work-related reasons. At the same time, Conewago recognizes that medical authorities view alcoholism and some forms of drug abuse as illnesses, and Conewago will not impose discipline on any employee solely on the grounds that the employee has admitted a problem and sought help. Conewago encourages employees to seek help through established channels. Where employees who have a problem show a sincere desire to overcome that problem and retain their jobs, Conewago will work with employees on a program to accomplish that objective. Conewago also encourages all employees at every level of the company to seek help at an early stage rather than facing the possible loss of a job for work-related reasons if the problem goes unchecked.

Applicability

These guidelines apply to all employees of Conewago. This policy is in addition to any policy or law, which requires drug or alcohol testing.

Substance Abuse

General Policy. The Company is confident that its employees are well aware of the obvious dangers to them, their co-workers, customers and others, both inside and outside the workplace, and to the Company in general from employee use or abuse of drugs and alcohol. The Company, therefore, is committed to establishing and maintaining an alcohol-free and drug-free workplace. In an effort to attain this goal, the Company has adopted the following policy in connection with drugs and alcohol.

No employee shall illegally manufacture, possess, sell, dispense, distribute, use, or have in his or her possession any illegal drug (or legal drugs used for unlawful purposes) while on or off duty.

No employee shall report to work, use Company equipment, or conduct Company business while impaired or under the influence of a drug or alcohol. For purposes of this

policy, the term "under the influence" means testing positive for any detectable use of any controlled substance or indicating the abuse of lawful substances. In the case of alcohol, under the influence means either: a) blood alcohol content of .02 or greater; or b) usage of alcohol to the point that it clearly impairs an employee's job performance. In the absence of a test result, documented observations of an employee's behavior/appearance may suffice to establish that the employee is under the influence of drugs or alcohol.

Possession or use of an illegal or controlled substance or alcohol is prohibited while en route to work or during work hours.

Off-duty conduct involving drugs or alcohol that may impact the Company's reputation or which, in the Company's judgment, affects an employee's suitability for his or her position shall be grounds for disciplinary action up to and including termination.

Any employee having a reasonable basis to believe that another employee is in violation of this policy shall immediately report the facts and circumstances to his or her supervisor or to the HR Department.

Exception. Employees are permitted to consume moderate amounts of alcohol at Company-sponsored events or other business functions where alcohol is served; provided, it is the employee's sole responsibility to avoid intoxication. Intoxication or other unprofessional conduct during these events shall be treated as a violation of this policy and may warrant disciplinary action. In the event an employee ever believes that he or she is not safe to drive home from a business event, he or she may request that a taxi or designated driver be provided and such transportation will be secured.

Medications. Employees may take over-the-counter medication or prescribed dosage of medication under the direction of a physician while on Company property, while using Company equipment, while conducting Company business or while on meal breaks or rest periods. When doing so, however, employees are responsible for being aware of any effect such medication may have on the performance of their job duties. If an employee is taking a medication that might affect the employee's ability to perform his or her job safely and efficiently, the employee must promptly report this to Human Resources. In these situations, the Company may require a certification from the employee's physician as a condition of returning to or continuing work.

When the Company determines, at its sole discretion, that an individual taking medication is unable to perform the essential functions of his or her current job under the circumstances safely, the Company may make reasonable accommodations including, but not limited to, placing such individual on a medical leave of absence or arranging for alternative work to be performed on a temporary basis.

Substance Abuse Testing. Employees may be subject to substance abuse testing at the direction of the Company in the following circumstances:

Reasonable Suspicion: When there is reasonable suspicion to believe that an employee is under the influence of controlled substances or alcohol, the employee will be asked by his or her supervisor to sign the consent form to undergo drug and/or alcohol testing. If an employee tests positive for use of controlled substances or for

being under the influence of alcohol, the employee will be terminated. If an employee tests negative, the employee will be permitted to return to work. Decisions to require an employee to consent to reasonable suspicion testing will be based on the observations of at least two supervisory employees when feasible. For purposes of this policy, the term "reasonable suspicion" means circumstances or employee behavior indicating alcohol or drug use. It includes, but is not limited to (a) direct observation of alcohol or other drug use and/or the physical symptoms of being under the influence; (b) a pattern of abnormal conduct, incoherent mental state or erratic behavior that is otherwise unexplained; (c) a criminal arrest, investigation or conviction for a drug-related offense; (d) information provided either by credible sources or independently corroborated; (e) newly discovered evidence that the employee has tampered with a previously administered substance abuse test; (f) other actions or conduct that create reasonable suspicion that the employee may be under the influence of or abusing alcohol or drugs.

Post-accident: The same procedure for reasonable suspicion testing will be followed if an employee is involved in a work-related accident where controlled substances could have played a role and that requires medical treatment or causes significant property damage, and which may be attributable in part to the employee's error.

Random testing: The Company may require random substance abuse testing in order to monitor and ensure compliance by all employees with this policy. Employees will be notified of their random selection for testing under this policy. Once selected, an employee will be required to sign the consent form to undergo the required testing.

Pre-Job: Certain owners and construction managers require that all employees working on their projects be subject to substance abuse testing before coming on-site. If you are scheduled to start work on such a project, you will be notified of any testing requirements and expected to comply with them in a timely manner.

Failure to consent to the required test(s) and failure to cooperate with the prompt administration of testing under this policy is considered equivalent to a positive test and will result in termination. Testing will be performed by a licensed and certified laboratory. Any test samples or results that have been tampered with shall be treated as positive.

Search of Property. The Company expressly reserves the right to conduct searches of lockers, desks, equipment and personal property located in or on, or brought in or onto Company property, work sites or other equipment. All locks used on Company property or equipment must be issued by the Company and are the property of the Company. Refusal to cooperate with a search conducted under this provision will be considered to be a violation of this policy.

Voluntary Assistance. Employees are encouraged to voluntarily seek assistance for drug and alcohol-related problems before those problems affect their workplace performance. An employee's decision to voluntarily seek assistance for such problems will not be used as the basis for disciplinary action. However, the act of seeking assistance for such a problem will not lessen any disciplinary action for violations of Company rules that already are under investigation at the time an employee seeks assistance.

Employees who are given the opportunity to seek treatment and/or rehabilitation are expected to successfully complete such treatment and/or rehabilitation and to follow all prescribed after care. Employees who fail to complete treatment and/or rehabilitation, fail to successfully overcome their dependence or fail to follow all prescribed after care will not automatically be given a second opportunity to seek treatment and/or rehabilitation.

State Laws. Employees performing work in states other than Pennsylvania for substantial periods of time shall be tested in accordance with the laws of those states and this policy shall be deemed amended to be consistent with those laws on such projects.

Disciplinary Action. Any employee who violates the terms of this policy may be subject to disciplinary action up to and including discharge for a first offense. Nothing contained in this policy shall be construed as a waiver of the Company's right to take disciplinary action against an employee under existing policies, procedures or work rules for unsatisfactory performance or misconduct. The use of or treatment for the use or abuse of drugs or alcohol will not be an excuse justifying poor work performance or misconduct. If an employee is suspended due to a drug/alcohol substance abuse violation, whether or not in rehabilitation, he or she may be required to some or all of their insurance premiums during the period of suspension. Please refer to Section 7.2 of this Handbook entitled "Continuation and Conversion of Health Insurance Benefits."

Amendment of Policy

Conewago reserves the right to alter, abolish, or amend this policy and any other term or condition of employment at any time without the consent of its employees. The adoption of this policy and the provision of any benefit hereunder does not create a contract of employment for a specific term, nor does it imply any right to continue employment.

REASONABLE SUSPICION OF ALCOHOL OR DRUG USE

THIS FORM MUST BE COMPLETED BY THE SUPERVISOR OR COMPANY OFFICIAL MAKING THE REASONABLE SUSPICION DETERMINATION THAT AN ALCOHOL OR DRUG TEST IS INDICATED. FOR REASONABLE SUSPICION TESTS, THIS FORM MUST BE COMPLETED WITHIN 24 HOURS OF THE DETERMINATION OR PRIOR TO RECEIPT OF THE TEST RESULTS WHICHEVER IS EARLIER.

Individual Name: _____

Date of Birth: _____ Social Security Number:

Reasonable suspicion of current use or impairment by:

Alcohol _____ Drugs _____ Both

Specific observations made (consider appearance, behavior, speech, motor skills, balance, gait, other):

_____

Check if the following conditions are met:

_____ Observations are specific, contemporaneous, and particularly on the appearance, behavior, speech or body odors of the individual.

_____ Observations for alcohol and/or drug reasonable suspicion testing made by a supervisor trained in accordance with requirements for supervisory personnel with required minimum training for alcohol and drugs, as applicable.

_____ For alcohol testing, observations are made during, just preceding, or just after the individual is required to be in compliance with Company policy or applicable regulations (if any).

_____ For alcohol testing, a breath alcohol technician (BAT) will perform the test.

Test only if all the above conditions are met.

If unable to test immediately after reasonable suspicion determination, state reasons:

_____

_____

_____ _____

SUPERVISOR/COMPANY OFFICIAL **DATE**

Comments and/or corroboration by a second supervisor or company official:

_____

_____

Other information or comments:

_____

Department of Transportation
Drug and Alcohol Abuse Policy

Under the jurisdiction of the Department of Transportation (D.O.T.) and in compliance with the Federal Highway Administration Regulations, Part 382, Conewago Enterprises, Inc. and Conewago Manufacturing, LLC are required to engage in alcohol and substance abuse testing. In accordance with the applicable provisions of the Omnibus Transportation Employee Testing Act of 1991, and the applicable regulations of D.O.T. and Conewago have established a substance policy for all motor carriers.

A. Scope

The D.O.T. requires employers to test for the following controlled substances, marijuana, cocaine, opiates, amphetamines and phencyclidine. The D.O.T. also requires employers to test for alcohol. Alcohol is defined under the regulations as the intoxicating agent in beverage alcohol, ethyl alcohol or other low molecular weight alcohols, including methyl and leopropyl.

B. Prohibited Conduct

Controlled Substances: A driver is prohibited from reporting to work, operating a motor vehicle, or otherwise performing safety-sensitive functions if any of the following have occurred:

1. The driver uses a controlled substance as defined within the scope of this policy.
2. The driver tests positive for a controlled substance.
3. The driver refuses to undergo testing in accordance with this policy or otherwise refuses treatment.
4. The driver is medically unqualified to drive.

A driver may use a substance administered by or under the instructions of a physician who has advised the driver that the substance will not affect their ability to safely operate a motor vehicle.

Any violation of this policy will result in discipline up to and including termination.

Alcohol: A driver is prohibited from reporting to work, operating a motor vehicle, or otherwise performing safety-sensitive functions if any of the following have occurred:

1. The driver has an alcohol concentration of .04 or greater. DOT Drug & Alcohol Abuse Policy
2. The driver possesses alcohol.
3. The driver has used alcohol within 4 hours of reporting to work.
4. The driver refuses to submit to an alcohol test or refuses to be treated.

A driver may not use alcohol within eight (8) hours following an accident or until the employee undergoes post-accident alcohol testing as described below.

Any driver who is found to have an alcohol concentration between .02 and .039 is prohibited from operating a motor vehicle or performing any safety-sensitive function until

the driver's next regularly scheduled duty (the driver will be "off the road" for 24 hours without pay). A driver who tests positive for an alcohol concentration of .04 or greater must undergo alcohol testing prior to returning to duty. A driver whose alcohol concentration is .04 or greater will be subject to disciplinary action up to and including termination.

C. Testing Required

1. Pre-employment Testing: Every offer of employment with Conewago is conditional upon successful completion of a DOT drug screen. The presence of any controlled substance, except a legally prescribed and identified drug, shall disqualify an applicant for employment.

2. Post-Accident: Any driver involved in an accident in which the driver is issued a citation for a moving vehicle violation under the state or local law or where loss of human life has occurred must undergo post-accident testing.

If a moving vehicle citation is issued to you, or there is loss of human life, it is your responsibility to produce a urine specimen within 2 hours after the accident. If this is not possible, you are required to have your urine collected for DOT drug test completed within 32 hours after the accident. You must also undergo alcohol testing within 2 hours after the accident. If this is not possible, you must be tested within 8 hours following the accident. If you sustain injury in the accident and for a valid reason are unable to supply a specimen within 2 hours, you are required to sign a document when you are able, releasing medical information to Conewago.

A driver who remains unavailable for testing other than for medical reasons following an accident will be deemed to have refused such testing and will be terminated.
DOT Drug & Alcohol Abuse Policy

To help you comply with the post-accident drug and alcohol testing procedure, the following guidelines should be followed:

a. Call law enforcement officials and medical assistance if necessary.
b. After law enforcement officials have arrived, cooperate fully in the accident investigation.
c. Collect names, addresses and telephone numbers of other parties involved.
d. Ask law enforcement officials if a citation will be issued, if the citation is for a moving vehicle violation under state or local law and, if not, whether the officer anticipates issuing you a citation. After receiving permission from the law enforcement officials to leave the accident scene, call Conewago's Safety Director. After receiving instructions from Conewago, report to the collection site as soon as possible.

   Provide a urine sample at the location designated by Conewago and have the alcohol testing administered.

3. Random Testing: Random Testing will be administered on a quarterly basis during the year. 50% of eligible drivers will be randomly selected for controlled substance testing and 25% of eligible drivers will be randomly selected for alcohol testing. These rates may be adjusted from year to year.

4. Random testing will be unannounced. Drivers selected for random testing will be notified by the Dispatch Office as to the site to report for testing within a 2-hour period.

5. Reasonable Suspicion Testing: A driver shall submit to controlled substance or alcohol testing when Conewago has reasonable suspicion that the driver has violated any of the prohibitions set forth. Transportation for this type of testing will be provided by Conewago.

6. Return to Duty Testing and Follow-Up Testing: Any driver who returns to duty after a positive alcohol test of .04 or greater or who has tested positive for controlled substances must undergo a return-to-duty test with a negative result for controlled substances and an alcohol concentration of less than .04. The driver will be responsible for the cost of return-to-duty testing.

A driver who has returned to duty following rehabilitation in an approved treatment program must undergo follow-up testing at periodic intervals as determined by a substance abuse professional. Such testing will occur at least six times within the first twelve months of a driver's return to work duty, or as recommended by a substance abuse professional. Follow-up testing will not exceed sixty months from a driver's return to duty. The driver will be responsible for the cost of follow-up testing.

D. Test Results

Drivers will be notified by the medical review organization if the driver tests positive for controlled substances or alcohol use. Conewago respects the confidentiality of these tests.

E. Employee Assistance Program

An Employee Assistance Program is offered to all drivers to help solve drug and alcohol problems by providing educational information concerning the effects and consequences of drug use and alcohol use on personal safety, and work environment.

Employee Assistance Program may be contacted at the following telephone numbers; Gettysburg (337-2257); Hanover (632-4020); Lancaster (481-7840); Shrewsbury (812-2560); East York (851-6340); West York (845-6641).

A driver who has engaged in prohibited conduct as set forth in this policy and/or the Drug and Alcohol Abuse Policy will be subject to discipline up to and including discharge. If Conewago recommends a driver to the Employee Assistance Program for counseling/rehabilitation and they undergo an approved rehabilitation program, nothing in this policy will insulate the driver from discipline for work performance or attendance problems which have been induced by drugs or alcohol.

Where a driver is not terminated for prohibited conduct and a rehabilitation program is recommended, the driver will be given a leave of absence and will be returned to work only after medical authorities have concluded that the driver is fit for duty. The driver's leave of absence will be one without pay. Conewago will not discriminate against a driver who is participating in a qualified rehabilitation program, provided the driver remains drug and alcohol free. Participation in a rehabilitation program will not insulate a driver from layoff, discipline, or discharge for other business reasons.

FLEET SAFETY

Table of Contents

FLEET SAFETY

POLICY STATEMENT

The Fleet Safety Program establishes guidelines and procedures to be followed to protect the safety of individuals operating any motor vehicle on Company business. Protecting our employee drivers, their passengers and the general public is of the highest priority to Conewago Enterprises, Inc. and Conewago Manufacturing, LLC.

The commitment of management and employees is critical to the success of this program. Clear communication of and strict adherence to the program's guidelines and procedures are essential.

DEFINITIONS: (See Appendix A for additional definitions.)

COMPANY VEHICLE: A motor vehicle owned by or leased to Conewago including temporary replacement vehicle.

MOTOR VEHICLE: "Company Vehicle" or any other motor vehicle while being operated on Company business.

DRIVER: Any employee assigned a "Company Vehicle" or who operates a "Company Motor Vehicle" on a permanent or temporary basis.

PROGRAM GOALS

The primary goal of the Fleet Safety Program (FSP) is to maintain a high level of safety awareness and foster responsible driving behavior. Driver safety awareness and responsible driving behavior will significantly decrease the frequency of Motor Vehicle accidents and reduce the severity of personal injuries and property damage. "Drivers" as defined in this program must follow the requirements outlined in the FSP. Violations of this program may result in disciplinary action up to and including suspension of driving privileges or dismissal.

PROGRAM RESPONSIBILITES

Everyone shares in the responsibility to make the FSP a success. To avoid confusion or misunderstanding, specific program responsibilities are outlined as follows:

A. "Drivers" are required to:

1. Read, understand and follow the requirements contained in this program;

2. Participate in Company sponsored activities or programs designed to improve driver safety;

3. Maintain a valid driver's license and adhere to license restrictions;

4. Complete the "Request for Check of Driving Information" (see Appendix B & C) and thereby provide signed permission for the Company or its designated representative to obtain "Motor Vehicle Records", and sign the "Fleet Safety Program Acknowledgment Form." (see Appendix D)

B. Human Resource Director will:

1. Ensure the "Request for Check of Driving Information Forms" are completed and signed by each employee.

2. Retain training documentation for all safe driving training.

C. Safety Director will:

1. Implement the FSP and ensure accountability for program requirements.

2. Evaluate and approve driver training curriculum.

3. Serve as a technical resource, ensuring the continuous development and maintenance of the FSP.

4. Ensure that all "Drivers" participate in Company safe driving training programs;

5. Secure training documentation for all safe driving training and forward them to the Human Resource Director for filing;

6. Preview "Motor Vehicle Reports" (MVR) and accident information to ensure that "High Risk Drivers" are identified and brought to the attention of management;

7. Be responsible for taking appropriate action to manage "High Risk Drivers" as defined by this program;

8. Investigate all "Accidents" and ensure that "Accident Reports" are completed.

AUTHORIZATION OF DRIVING PRIVILEGES

A. "Designated Driving" employees will not be assigned or allowed to use or drive a Company "Motor Vehicle", if:

1. The "Driver" does not have a valid operator's license issued by their state of residence; or if

2. The "Driver" possesses licenses from more than one state; or if

3. The "Driver's" license is suspended, revoked for any reason, or the employee has multiple moving violations.

AUTHORIZED VEHICLE USE PER COMPANY HANDBOOK 7.17 AND 7.18

Per paragraph 7.17 "Use of Personal Motor Vehicle for Business Use":

Prior approval of the use of privately owned vehicles for Company business is required. Employees shall be responsible for any fines incurred as a result of traffic or parking violations. The Company assumes no liability for damage to your vehicle or other costs arising from work-related travel. An employee who uses his or her own vehicle for Conewago business will be reimbursed for mileage when, and only when, it is authorized by the Company at a rate set by Management. This rate is subject to review on an annual basis. Do not use your motor vehicle for Conewago business unless you have been authorized to do so." Those employees who regularly use their personal vehicles for company business, must provide proof of insurance coverage yearly to Conewago's Corporate Insurance Administrator.

In addition, employees using their own vehicle for business use will not engage in passenger transport such as rideshare (ie: UBER), or on-demand food/package delivery (ie: DoorDash) while on company business.

Per paragraph 7.18 "Use of Company-Owned Vehicles":

Vehicles are provided for the business use of Conewago only. Company-owned vehicles are not to be used for personal use without the express authorization of a Company Officer. All vehicles are to be operated in a safe and responsible manner. The negligent use of or damage to any vehicle may be considered grounds for termination of employment. Any costs incurred due to motor vehicle violations (example: speeding and parking tickets) shall be the responsibility of the operator and may be recovered by the Company through payroll deduction if necessary. The use or transporting of any alcoholic beverages in any vehicle is prohibited. Transporting of anyone who is not a Company employee is strictly forbidden.

Vehicles may be temporarily assigned, at the discretion of a Company Officer, to an individual or a jobsite for the convenience of the Company. Temporary assignment of vehicles will be done under the following circumstances:

a) When the assignment of a vehicle is required to provide additional transportation of company employees and/or materials to a specific project.

b) When an employee is required to travel extensively in the performance of his or her assigned duties.

c) When the personnel are required to perform off-duty/on-call repairs to utility systems or Company equipment.

All assigned vehicles, with the exception of special purpose vehicles, are to be made available for general use for all Company functions when not performing their assigned tasks.

The use of any Company-owned vehicle to travel from home to work, or from work to home, is prohibited, unless specifically authorized by a Company Officer. The use of vehicles for travel to and from an employee's home may be authorized for the following reasons and are not considered personal use:

a) The employee is on call to make emergency repairs of utilities or equipment.

b) The employee is responsible for the security of expensive tools and equipment that are carried in a specified vehicle, and the employee's home location is more secure than the Company's facilities.

c) The employee is asked to be contacted while commuting, or the employee is required to travel frequently after duty hours on Company business.

Employees who are authorized users of vehicles to and from their residences must observe the following rules:

a) Vehicles are to be operated in a safe and legal manner.

b) Vehicles are not allowed to stop enroute for any personal business.

c) No vehicle may be used to stop at any establishment serving any alcoholic beverages.

d) No passengers other than Company employees are permitted in Company vehicles.

e) Vehicles are to be kept clean and presentable. Trash must be removed daily.

f) No company vehicle may be used at any time for passenger transport, such as rideshare (ie: UBER), or on -demand food/package delivery (ie: DoorDash)

In an attempt to keep all company owned vehicles and equipment ready for use for the next employee, the following steps will be implemented immediately.

- Fuel up vehicles after every use if the employee will not be assigned the vehicle the next day or if the vehicle will require fuel for the next day.
- Report <u>All</u> vehicle problems to the garage immediately.
- Leave no personal protective equipment behind i.e., hardhat, harness, lanyard, gloves.
- Be sure all trash is removed from vehicle after every use such as coffee cups, wrappers, sandwich bags and food.

Violators of this policy may be subject to disciplinary action or loss of driving status. Remember, the next person driving, or operating equipment could be you. Be sure that you prepare the vehicle for the next person.

Employees may be held responsible for paying any damages or fines incurred as a result of their operation of a Company Vehicle (e.g. repair cost, speeding, parking ticket, etc.), depending on severity and circumstances of loss.

Violation of any part of this policy by an employee may be considered grounds for dismissal or loss of driving status. Employees may be held responsible for paying any damages, repairs or fines incurred as a result of their operation of a Company vehicle, depending on severity and circumstances of loss.

DRIVER MVR CHECKS

A. Initial MVR Checks

1. Employee Applicants: All employee applicants will complete "Request for Check of Driving Information Form" (see Appendix B & C). The Human Resource Director will use the forms to obtain a MVR for evaluation. Thereafter, periodic MVR checks will be conducted to monitor compliance.
2. The Human Resource Director will distribute MVR's to the Safety Director and Risk Manager for their review. The Human Resource Director is responsible for filing the MVR along with the original request form.

B. Yearly driver MVR Checks

1. All Employees who drive company vehicles will complete a “Request for Check of Driving Information”. The Human Resources Director will use the form to obtain a MVR for yearly evaluation.
2. The Human Resources Director will distribute MVR’s to the Safety Director and Risk Manager for review. The Human Resource Director is responsible for filing the MVR along with the original request form.

IDENTIFICATION OF PROBATIONARY DRIVERS

A "Driver" may be classified as a "Disqualified Driver" if the MVR check so indicates, or if it is otherwise determined, that the driver has <u>one or more</u> of the following violations:

1. Conviction of Reckless Driving
2. Driver’s License Suspended or Revoked
3. Leaving the scene of an accident as defined by state law
4. Felony committed involving a vehicle
5. At-Fault in Fatal Accident
6. Discretion of Company

IDENTIFICATION OF PROBATIONARY DRIVERS

A. A "Driver" will be classified as a "Probationary Driver" if the MVR check so indicates, or if it is otherwise determined, that the driver has <u>one or more</u> of the following violations:

1. Conviction for an alcohol and/or drug related driving offense;

2. Refusal to submit to a Blood Alcohol Content (BAC) test;

3. Any combination of three or more moving violations, "At Fault Accidents", or "Preventable Accidents" within the most recent three years;

4. Suspension, revocation or administrative restriction within the last three years;

5. At fault in a fatal accident;

6. Three speeding tickets.

7. Discretion of Company.

MANAGEMENT CONTROLS FOR PROBATIONARY DRIVERS

If an employee is identified as a "High Risk Driver", the Safety Director and Management must choose either Option 1 or Option 2:

A. Option 1: Probation

1. Place the " Driver" on probation (ending one year from the date of the most recent violation or, in the case of suspension, one year from license reinstatement).

2. Obtain a MVR from the Human Resource Director every six months for the duration of the probationary period at the driver's expense.

3. The Safety Director will notify the Human Resource Director and Risk Manager of any additional violations while the employee is on probation.

4. Immediately suspend driving privileges if any single repeat violation or any additional violation occurs while on probation as described in Section VII – OR if any terms of probation are violated.

5. The Safety Director and Management must confer on any stipulations, operating limitations or other conditions, such as:

   a) Loss of all "Company Vehicle" driving privileges;
   c) Loss of "Company Vehicle" driving privileges between work and home;
   d) Transfer of the "Driver" to a non-driving position; or

   e) Additional driver training.

6. The terms of probation are to be noted on the "Fleet Safety Contact Report" (see Appendix E). The employee will be required by signature to signify that he/she has been informed of the probation terms and duration. The original signed terms of probation will be kept in the employee's personnel file.

7. If the probationary period has been served and if reinstatement of driving privileges is warranted, the Safety Director shall notify the Risk Manager and Human Resource Director.

B. Option 2: Suspension of Driving Privileges

If the Safety Director and Management must suspend all Company driving privileges, the " Driver" will NOT be authorized to drive a motor vehicle at any time on Company business.

This action may result in either transferring the employee to a non-driving position, if such a position exists, or the employee may be subject to dismissal procedures.

The employee may re-apply for Company driving privileges after one year of suspension. Application should be made to the Safety Director. If approved, the employee's driving status will change from suspension to probation. However, reinstatement of driving privileges by the Safety Director does not constitute an offer by the Company for any "Driver" position. Normal job posting procedures will still have to be followed.

ACCIDENT REPORTING

A. Accident Reporting

1. “Accident Investigation Reports” must be completed as soon after the accident as reasonably feasible, signed by the supervisor and presented to the Safety Director for signature. A copy is then forwarded to the Risk Manager.

2. Supervisor Notification – the "Driver" is required to notify their Supervisor of any "Accident" as soon as possible. In addition, supervisors/employees are responsible for reporting all accidents to the Safety Director and/or Risk Manager as soon as possible.

3. Company Vehicles – the "Driver" must complete the "Accident Investigation Report,” have it signed by the supervisor and Safety Director. A copy is then forwarded to the Risk Manager.

4. Non-Company Vehicles – the "Driver" will call his/her personal automobile insurance carrier.
5. Leased Vehicles – the "Driver" will notify the Safety Director and/or the Risk Manager, then complete an "Accident Investigation Report.”

6. Daily Rental Vehicles – the "Driver" will notify the Rental Company.

7. The investigation of certain accidents will be conducted and controlled by counsel. In those circumstances, the above policies and procedures may be modified and/or suspended.

B. Accident Investigation

1. After receiving the completed "Accident Investigation Report Form", the Safety Director will:

   a) observe the accident scene and damaged vehicle(s) (if possible);

   b) obtain a copy of the police report, if available;

   c) review the completed "Accident Investigation Report Form" obtained from the "Driver", and

   d) interview the "Driver" and any employee witnesses.

3. The Safety Director and Management, with recommendation by the Safety Committee, are responsible for reviewing the completed "Accident Investigation Report Form" and initiating any actions to prevent the reoccurrence of similar accidents by this "Driver."

4. <u>The investigation of certain accidents will be conducted and controlled by counsel. In those circumstances, the above policies and procedures may be modified and/or suspended.</u>

C. Preventability Analysis

Conewago performs post-accident preventability analysis in order to critically examine accidents with an eye towards better understanding the accident and in an effort to attempt to avoid future incidents. The preventability analysis involves a retrospective look at all factors leading to an accident. The preventability determination is a remedial measure to assist Conewago and its drivers regarding safety and accountability. As such, the standard for the determination of preventability is intentionally broader than any definition of negligence in the context of auto litigation.

Accident prevention goes beyond observing traffic rules and regulations. Conewago's internal standard of determining preventability is based upon whether an accident could have reasonably been avoided and does not focus on who was primarily responsible or at fault. A preventability determination also considers the other person's faulty driving or failure to observe traffic regulations. An accident may be deemed preventable even if the other driver's actions or inactions caused or contributed to the accident.

Federal Motor Carrier Safety Regulations require motor carriers to have systems, policies, programs, practices and procedures regarding accidents. Conewago's Preventability Analysis is performed in an effort to comply with the Federal Regulations. Any internal determination of "preventable" is done in an effort to monitor drive behavior, increase safety and to comply with regulations. The preventability determination does not and is not intended to have any bearing on or applicability to the question of legal fault for an accident. Likewise, any determination of preventability is not an admission of fault or negligence. A determination of preventability does not pose a greater duty or standard on Conewago or its drivers than that which is required by law.

There are occasions when post-accident investigation is controlled and managed by Conewago's legal counsel. In those situations, a preventability analysis and determination may not be made by Conewago until the conclusion of any related litigation so that all applicable facts, testimony, and expert analysis may be considered.

OTHER REPORTING RESPONSIBILITIES OF DRIVERS **A.**

Supervisor Notification

"Drivers" are required to notify their immediate supervisor as soon as possible of:

- Any illness, injury, physical condition or use of medication that may impair or affect their ability to safely drive a "Motor Vehicle," or
- The suspension, revocation, or administrative restriction of his/her operator's license. If this occurs, the "Driver" must also immediately
  discontinue use of the "Motor Vehicle" and contact the Safety Director.

PLEASE NOTE: FAILURE TO REPORT UNDER THE PROVISIONS OF SECTION IX AND X IS A VIOLATION THAT COULD RESULT IN DISCIPLINARY ACTION, UP TO AND INCLUDING DISMISSAL.

TRAINING

A. Topics and materials will be provided by the Safety Director for periodic safe driving training. Employees are encouraged to contact the Safety Director for any specific training needs. It is the Safety Director's responsibility to see that all driver training is documented. Documentation must include the course name, date completed, driver's name and identification.

SAFETY REGULATIONS

A. Vehicle Safety Belts

The "Driver" and ALL OCCUPANTS are required to wear safety belts when operating or riding in a "Motor Vehicle."

B. Impaired / Distracted Driving

A "Driver" may not operate a "Motor Vehicle" at any time, when his/her ability is impaired, affected, or influenced by alcohol, illegal drugs, medication, illness, fatigue, or injury, or when distracted by phone, radio, other passengers, etc.

C. Traffic Laws

All "Drivers" are required to abide by all federal, state, and local motor vehicle regulations, laws and ordinances.

D. Vehicle Condition

Each "Driver" is responsible for ensuring that the "Motor Vehicle" is maintained in a safe driving condition. At least daily, a walk-around safety inspection by the "Driver" is required.

E. Additional Safety Rules "Drivers"

may not:

1. Pick-up hitchhikers;

2. Accept payment for carrying passengers or materials (this does not apply to company endorsed car pools).

3. Use any radar detector, laser detector or similar devices;

4. Push or pull another vehicle, or tow a trailer without authorization;

5. Transport flammable liquids and gases unless a DOT or UL approved container is utilized, and only then in limited quantities and only when necessary;

6. Assist disabled motorists or accident victims beyond the level of their medical training; EMT, CPR, Basic First Aid, etc. If a driver is not qualified to provide the above services, he/she must restrict his/her assistance to calling the proper authorities.

7. Use cell phones to send or read text messages or email messages at any time during the operation of a motor vehicle.

GLOSSARY OF TERMS

1. **ACCIDENT:** Any incident involving a "Motor Vehicle" as defined in the "Fleet Safety Program" that results in bodily injury or property damage.

2. **DRIVER:** An employee assigned a "Company Vehicle" or who operates a "Company Motor Vehicle" on a permanent or temporary basis.

3. **AT FAULT ACCIDENT:** An "Accident" where the "Driver" received a moving violation ticket issued by a police officer.

4. **COMPANY VEHICLE:** A motor vehicle owned by or leased to Conewago, including a temporary replacement vehicle.

5. **PROBATIONARY DRIVER:** Any driver on probation or whose driving history meets the criteria outlined in Section VII – "Identification of High Risk Drivers."

6. **MOTOR VEHICLE:** A "Company Vehicle"; or any other motor vehicle while being operated on Company business.

7. **MOTOR VEHICLE RECORD (MVR):** A document supplied by the appropriate State Department of Motor Vehicles providing information on motor vehicle violations and license status of a specific driver.

8. **NON-COMPANY VEHICLE:** Any motor vehicle used on Company business not provided by the Company, including privately owned, leased or rented vehicles. This definition does not include motorcycles.

9. **PREVENTABLE ACCIDENT:** Any "Accident" where the employee could have avoided the accident.

10. **SERIOUS ACCIDENT:** Any "Accident" where there is a fatality, or an injury requiring the transportation of the injured party from the accident site to a medical treatment facility.

REQUEST FOR CHECK OF DRIVING INFORMATION

1. In accordance with the provisions of Section 604 and Section 607 of the Fair Credit Reporting Act, Public Laws No. 91.508, I hereby certify that the driving information requested will be used for a "permissible purpose" as defined in the Act, and that the information received will be used for no other purpose.

2. I further certify that if the person named below if denied employment based on the information received, I will identify the source of the report in accordance with Section 615(a) of the Fair Credit Reporting Act.

(Signature of Requester) _____ (Date) _____

(Employee/Applicant Name) _____ Social Security Number _____

(Operator's #) _____ (State)

(Date of Birth) _____

I hereby authorize you to release my driving information to Conewago Enterprises, Inc. or Conewago Manufacturing, LLC for purposes of investigation as required by section 391.23 of the Federal Motor Carrier Safety Regulations. You are released from any and all liability which may result from furnishing such information.

(Employee/Applicant Signature) _____ (Date) _____

If I lose my license during my employment, I understand it is my obligation to notify the Human Resource Director, as well as, anyone who requests I drive a Company vehicle.

(Employee/Applicant Signature) _____ (Date) _____

I presently do not possess a valid state driver's license and understand I am NOT to drive any Company vehicles on the road. If asked to drive a Company vehicle, it is my responsibility to notify the requester that I do not have a valid driver's license. If in the future I acquire a driver's license, I will immediately notify the Human Resource Director to execute appropriate documents.

(Employee/Applicant Signature) _____ (Date) _____

DL-503 (5-02)

REQUEST FOR DRIVER INFORMATION

PRINT OR TYPE ALL INFORMATION LEGIBLY — DO NOT SEND CASH

SEE REVERSE FOR INSTRUCTIONS / INFORMATION

CHECK (V) ONE ONLY:

- ❑ BASIC INFORMATION: $5.00 FEE *(Driver history is not included)*
- Ei 3 YEAR DRIVER RECORD: $5.00 FEE
- El 10 YEAR DRIVER RECORD: $5.00 FEE *(Employment Purposes Only)*
- CI CERTIFIED DRIVER RECORD: $10.00 FEE
- D COPY OF DOCUMENT FROM FILE (MICROFILM): $5.00 FEE
- Ej CERTIFIED COPY OF DOCUMENT FROM FILE: $10.00 FEE

A REQUESTER INFORMATION

NAME/COMPANY

ADDRESS *P.O. Box number may be used in addition to the actual address, but cannot be used as the only address.*

CITY **STATE** **ZIP CODE**

DAYTIME TELEPHONE NUMBER ***(REQUIRED)***

RELATIONSHIP TO DRIVER ***(REQUIRED)***

SIGNATURE X

NOTARIZATION NOT REQUIRED WHEN REQUESTING YOUR OWN RECORD

B END USER OF INFORMATION BEING REQUESTED

NAM E/COMPANY

ADDRESS *(PO Box not acceptable), need to provide physical location of business/residence*

CITY **STATE** **ZIP CODE**

DAYTIME TELEPHONE NUMBER ***(REQUIRED)***

RELATIONSHIP TO DRIVER ***(REQUIRED)***

C DRIVER INFORMATION

NAME: LAST **FIRST** INITIAL

ADDRESS

CITY

STATE ZIP CODE

PHONE NUMBER

DRIVER NUMBER

DATE OF BIRTH **MONTH DAY** YEAR

SOCIAL SECURITY NUMBERabove

D AFFIDAVIT OF INTENDED USE

Intended Use of the Information Requested: CHECK ONLY ONE

0 B = Driver Release *(Driver has given written authorization to obtain his/her record.)*

0 C = Credit *(In connection with a credit transaction involving the driver.)*

1111 E = Employment *(To support the hiring or the continuation of employment. Employer must have driver's signed release on file.)*

I R = Insurance Company requesting record of person it intends to insure, now insures, or has rejected for insurance.

- K = Court Order must be attached. *(A subpoena issued in compliance with Pa. R.C.P. 4009.27 will be accepted in lieu of a court order).*

L = Attorney representing driver identified in Section C *(Driver has given written authorization to obtain his/her record)*

I hereby Certify that _____
PRINTED NAME OF **REQUESTER**

will use the driver record abstract(s) required pursuant to Section 6114 of the Pennsylvania Vehicle Code, for the purpose checked only and no other reason. This affidavit is filed in compliance with Section 607 of the Fair Credit Reporting Act. I/We have read and signed this form after its completion, and I/We swear or affirm that the statements made herein are true and correct, and that any statement made on or pursuant to this form is subject to the penalties of 18 PA C.S. Section 4903(a)(2) (relating to false swearing), which shall include punishment of a fine not exceeding $5,000, or to a term of imprisonment of not more than two years, or both.

E DRIVER RELEASE

I _____ hereby request
NAME OF DRIVER

the Department of Transportation to furnish a copy of my PA Driver's Record to

NAME OF PERSON/COMPANY

X _____ Title
SIGNATURE OF DRIVER DATE

X

SIGNATURE OF REQUESTER

F MICROFILM

TYPE OF DOCUMENT	DATE OF VIOLATION
(see list of available documents below)	

NOTARIZATION

SUBSCRIBED AND SWORN TO BEFORE ME: MONTH DAY **YEAR**

X

SIGNATURE OF PERSON ADMINISTERING OATH

Documents Available: • Citations • Suspension Credit Affidavits -Court Certifications • Suspension/Revocation Letters • Applications - Restoration Letters • License Renewals • Rescind Letters • Judgments • Department Hearing or Exam Notice		S E A L	SIGN IN PRESENCE OF NOTARY

MESSENGER NO. www.state.pa.us

FLEET SAFETY ACKNOWLEDGMENT FORM

I hereby acknowledge that I have received and read a copy of the Fleet Safety Program. I agree to comply with the policies and procedures contained in the program.

~~(Driver's Signature)~~ _____ ~~(Date)~~ _____

~~(Driver's Name) Print~~ _____

Appendix E

FLEET SAFETY CONTACT REPORT

Date: _____ Time: _____

Employee's Name: _____ ID #:

Purpose: Commendation _____ Discipline_____ Discharge

Probation for Driving Privileges_____ Driver Training _

Loss of Driving Privileges _____ Reckless Driving _

Facts:

Action Taken:

Employee's Reaction and Supervisor's Comments:

Personal Protective Equipment (PPE) Program

Purpose:

The purpose of this program is to protect Conewago employees by ensuring that Personal Protective Equipment (PPE) is provided, used, and maintained in a sanitary, reliable condition whenever it is necessary due to hazards from processes or in the work environment. To the extent that it is possible or feasible, the company will remove or eliminate hazards through engineering means to eliminate the need for PPE.

This program covers eye and face protection, head protection, hand protection, and foot protection. Respiratory hazards and hearing hazards are covered separately on pages (158 and 135) of this handbook. This program covers the responsibilities of managers, supervisors and workers, assessment of hazards, selection and use of PPE, and training.

Responsibilities:

The Company is responsible for assessing the hazards and exposures that may require the use of PPE and determining the type of equipment to be provided. Input from managers, supervisors, and employees will be obtained and considered in selecting the appropriate equipment.

Managers / supervisors will be responsible for training employees in the proper use and care of PPE, ensuring that all employees are assigned appropriate PPE, and ensuring that PPE is worn by employees when and where it is required.

Employees are responsible for following all provisions of this program and related procedures. They are expected to wear PPE when and where it is required. All PPE is provided by Conewago and employees must wear company provided PPE.

Subcontractors are responsible for following all provisions of this program and related procedures when performing work for Conewago. When the provisions in this program exceed those of a subcontractor's company policy, the subcontractor shall conform to the higher standards set forth by Conewago.

When a General Contractor or Site Owner requires PPE above and beyond that which is outlined in this policy, Conewago employees and subcontractors shall conform to those higher standards for the duration of the project, as required.

Hazard Assessment:

The company will perform an assessment of the workplace to determine if hazards are present, or likely to be present, which necessitates the use of PPE. This assessment will consist of a survey of the workplace and job sites to identify hazards to employees. Consideration will be given to hazards such as impact, penetration, laceration, compression, environmental exposures, etc. Wherever such hazards are present or likely to be present, the company will:

- Select, and have each affected employee use, the types of PPE that will protect the employee from the hazards identified in the hazard assessment.
- Communicate equipment selection decisions to each affected employee.
- Select and supply PPE that properly fits each employee.
- Train and retrain employees in the use and care of PPE as described elsewhere in this program.

Requirements for Selection and Use of Personal Protective Equipment:

- **Eye and Face Protection:** Safety glasses shall be worn at all times by employees and subcontractors assigned to project construction, warehouse duties, steel production areas and plant operations. In addition to safety glasses, face shields shall be worn when chipping, grinding, welding, cutting, or working with compressed air. All eye and face protective devices shall conform to ANSI Z87.1-1989.

- **Hearing Protection:** Hearing protection is provided to employees exposed to and 8-hour time-weighted average of 85 decibels or greater at no cost to the employees. The company provides hearing protection to all affected employees based on the jobsite hazard assessment. All available hearing protection is approved and have appropriate NRRs (Noise Reduction Ratings). Headphones and earbuds are not permitted.

- **Head Protection:** Hard hats shall be worn at all times by employees and subcontractors assigned to project construction, warehouse duties, steel production areas and plant operations. All hard hats and other head protective devices shall conform to ANSI Z89.1-1986.

- **Hand Protection:** Gloves shall be worn by all employees and subcontractors assigned to project construction, warehouse duties, steel production areas and plant operations, when they are engaged in or assisting with work activities. Glove selection will be based on task performed, conditions present, duration of use, and the hazards and potential hazards identified.

- **Foot Protection:** Steel toe or composite toe work boots shall be worn at all times by employees and subcontractors assigned to project construction, warehouse duties, steel production areas and plant operations. Protective footwear must have an all leather upper and be laced (not slip on or pull on styles). Additional foot protection may be required when performing certain tasks or working near certain hazards, based on the written Hazard Assessment. All protective footwear and additional foot protective devices shall comply with ANSI Z41-1991.

- **High Visibility Outerwear:** High visibility or fluorescent colored outerwear shall be worn at all times by employees and subcontractors assigned to project construction, warehouse duties, steel production areas and plant operations. Employees and subcontractors engaged in highway and road construction activities shall wear high visibility apparel at all times. High visibility apparel shall conform to ANSI/ISEA 107-2015.

**** All defective or damaged PPE must be immediately removed from service.**

Training:
Each employee that is required to use PPE will be trained in the following:

- Why PPE is necessary

- When PPE is necessary

- Which PPE is necessary based on the task, and any alternative equipment choices

- How to properly don, doff, adjust, and wear PPE

- The proper care, maintenance, storage, useful life, replacement and disposal of PPE

Emergency Action Plan

The Emergency Action Plan addresses emergencies we could reasonably expect at Conewago such as fire and windstorm hazards or sudden and accidental spills of hazardous material. The purpose of the Plan is to effectively achieve employee safety and health in an emergency. It is Management's responsibility to communicate what actions employees are to take if an emergency situation arises. It is the employee's responsibility to understand and keep up to date on the plans, which may affect them.

RESPONSIBILITY

1. It is the responsibility of all levels of management to ensure that these procedures are followed as specified.
2. It shall be the day-to-day responsibility of the Site Foreman or Plant Floor/Department Manager to represent the Project Manager or Plant/Department Management in all areas of fire and windstorm emergency planning and procedures. Although some of these responsibilities may be delegated to others, the Site Foreman and Plant Floor/Department Manager are ultimately accountable for the success of the Emergency Action Plans and Procedures. In the absence of the Site Foreman or Plant Floor/Department Manager, they will appoint an assistant, replacement, or the Safety Department to enforce the Emergency Action Plan process. The Safety Department will be the company contact and representative in all areas of Hazardous Chemical Spills.
3. The following Company Representatives should be contacted as soon as possible after fire, ambulance,or police.
    - **a.** Christy Clingan 717-870-4826 cell
    - **b.** Scott Weaver 717-476-8618 cell
    - **c.** Shawn Miller 717-640-0671 cell
    - **d.** Adam Hicks 717-479-1396 cell

FIRE

DEFINITION: There are two types of fires which may occur in the plant or on a construction site. Each one requires a different type of reaction or evacuation process.

1. **Incipient Stage Fire**: This is the less serious fire. It is a fire in the initial or beginning stage and can be controlled or extinguished with portable fire extinguishers without the need for protective clothing or breathing apparatus.
    - **a. Warning Systems:** The employee who first notices the incipient stage fire is responsible for notifying employees and supervision by using the PA system or megaphone,. A site employee would use an air horn (3 short, 5 second blasts). Simply yelling "FIRE" to alert employees in the immediate area is also acceptable.
    - **b. Evacuation Procedure:** All employees who are not trained to fight this type of fire or who are not part of a team trained to help in extinguishing the fire, must evacuate to a minimum distance of 100 feet from the fire once it is discovered.
    - **c. Assembly:** All employees and visitors to the plant or site will assemble in the designated assembly area in the Site-Specific Plan or Plant Emergency Action Plan for accountability and head count. They will remain in the designated area until instructed by supervision to do otherwise. If the fire progresses to a Structural Fire, alarms should be activated, and all employees should immediately evacuate to the assembly area.
    - **d. Location/Incident management:** The site Foreman or Plant Floor/Department manager is responsible for the following.
        - **i.** Ensuring the affected area has been evacuated

ii. Supervising the extinguishing of the fire
iii. Turning off any alarms and calling the evacuated employees back to their jobs
iv. Taking all spent fire extinguishers to the warehouse
v. Reporting the fire to the Safety Department and Project Manager or Plant/Department Management
vi. Completing the incident report to include corrective actions or preventative measures.
vii. Work with maintenance, warehouse, owners and management to address repairs or damages.

2. **Interior Structural Fire:** This is a fire beyond the beginning stage or contained to a small area. Interior Structural Fire Fighting is the physical activity of fire suppression, rescue, or both, inside of buildings or enclosed structures. Protective clothing and breathing apparatus are used by trained fire fighters.
   a. **Warning Systems:** An announcement will be made over the paging system in the plants and offices including the location of the fire. The plants will use the megaphones with an alarm and make an announcement regarding the location of the fire. The jobsites will use an airhorn, megaphone, or verbal alerts.
   b. **Evacuation Procedure:** All employees must evacuate the facility or jobsite using the most accessible route (evacuation route maps are posted throughout buildings) and report directly to the designated assembly area for a headcount.
   c. **Assembly:** It is the responsibility of anyone who has a visitor or contractor on site to review the evacuation process with them and ensure that they report to the assembly area for headcount along with all employees. The site Foreman or Plant Floor / Department manager is responsible for taking the visitor log or other records to the assembly area to make sure all are accounted for. All are to remain at the assembly area until told to do otherwise.
   d. **Location / Incident management:** The site Foreman or Plant Floor/Department manager is responsible for the following.
      i. Calling 911 and following CAT LOSS procedures.
      ii. Point of contact on scene for Fire Department
      iii. Send someone to the road to direct the fire department to the fire location
      iv. Make sure all employees, visitors, and contractors are accounted for.
      v. Reporting the fire to the Safety Department and Project Manager or Plant/Department Management
      vi. Completing the incident report to include corrective actions or preventative measures.
      vii. Work with maintenance, warehouse owners and management to address repairs or damages.

WINDSTORM

DEFINITION: Windstorms include Tornadoes and Severe Thunderstorms. These storms contain winds strong enough to destroy large portions of the plants or jobsites. Therefore, it is necessary to move all employees to designated areas whenever the possibility of a windstorm appears to be imminent.

1. Radio and radar monitoring will be established whenever threatening weather is forecasted. It will be the responsibility of the Site Foreman, Plant Floor or Department Manager, and Dispatch to monitor these when a tornado "watch or "warning" is in effect for this area. If it is determined that a tornado may strike the following should be followed.
   a. Home Facility: An announcement will be made over the PA system, or the airhorn/megaphone will be used to alert all employees to seek shelter. The shelter should be in a room with 4 interior walls and no windows. All overhead and

exterior doors should be closed. Headcount is taken at shelter. After the storm has passed, management will do a site assessment for any hazards caused by the storm and evacuate employees when it is safe to do so. If there is storm damage, plant or office management will follow the Disaster Recovery Plan to get repairs scheduled and completed and shut down or schedule work as appropriate.

a. The safety department will assist with any injuries, hazard assessment, chemical spills, and incident reporting.

b. Site: Radar is monitored by foreman for storms and site work may be cancelled. If an unexpected storm "pops" up, or a "watch" is issued for the immediate area, the foreman is responsible to shut down the site, secure materials, and evacuate employees.

EARTHQUAKES

1. Warning of impending earthquakes is limited. If the company receives knowledge of a pending earthquake, employees will be notified over the PA system or by voice command if at all possible.
2. When an earthquake occurs, or when a warning of an impending earthquake is received:
   - **a.** Employees should evacuate the building immediately if possible. Be aware of underground gas lines and overhead electrical lines. Expect any fire alarms to go off. Do not use elevators. If unable to evacuate, get low beside a large piece of furniture and cover your head with your arms.
   - **b.** If the employee is on a jobsite, they should get to an open area away from the building pad while watching for underground gas lines or overhead electrical lines and any excavations on the site.
   - **c.** If in a vehicle, stop in a clear area that is away from buildings, trees, overpasses, underpasses, or utility wires.
3. Afterward:
   - **a.** Expect aftershocks.
   - **b.** Check yourself for injury and assist others if trained to do so.
   - **c.** If in a damaged building, go outside if possible and quickly move away from the building. Do not enter a damaged building.
   - **d.** If you are trapped, cover your mouth. Send a text or bang on a pipe or wall so that rescuers can locate you.
4. If there is damage, plant or office management will follow the Disaster Recovery Plan to get repairs scheduled and completed and shut down or schedule work as appropriate.

CHEMICAL SPILLS

INTRODUCTION – There are 2 types of hazardous chemical spills that may occur in the plant or on the jobsite. Each one requires a different type of emergency action.

DEFINITIONS -

1. **Small Spill –** An escape of a hazardous chemical in a quantity similar to the normal exposure an employee would encounter in normal use of the product.
2. **Large Spill –** An uncontrolled release of a hazardous chemical that exceeds normal production exposures.

PROCEDURES –

1. Notify a Supervisor/Manager/Foreman of all spills.
2. Notify the Safety Department
3. Small spills should be cleaned up using the guidance on the SDS for that chemical regarding exposure effects and other hazards. Refer to pictograms in the SDS document.

4. Large spills must be contained using materials in the spill kit. This may include drain covers, pig socks or pig mats. Consult the SDS sheet for information regarding hazards from exposure to the chemical, and any other hazards indicated by pictograms in the SDS. Follow SDS instructions or guidelines for clean-up of the chemical. Use a "safety watch" when cleaning up large spills.
5. Contact the Supervisor/Manager/Foreman and the Safety Department if you are unsure what actions to take or if exposure cannot be sufficiently determined.

WORKPLACE VIOLENCE (Refer to policy in Conewago Safety Manual pg.25)

DEFINITION: Any act that threatens the safety of an employee and/or customer, affects the health, life or well-being of an employee and/or customer, or results in damage to company property. Such acts include but are not limited to threatening, intimidating, coercing, harassing (including sexually harassing), assaulting, or carrying concealed weapons on company property or jobsite.

PROCEDURES:

1. Report any incidents of harassment or threats immediately to plant or site supervision, HR or Safety department.
2. Remove yourself from the area or situation. Evacuate the building or site if necessary and alert other employees.
3. Hide if necessary by barricading yourself in a dark room. Lock door. Turn cell phone to vibrate and turn off screen light.
4. Call 911 and report to assembly area if safe to do so.
5. If the threat of violence is a bomb threat and you have answered the phone:
    a. Signal for someone working close to you to get an evacuation of the area started immediately and contact plant or site management.
    b. Get as much information from the caller as possible regarding
        i. Location of the bomb (where)
        ii. Planned time of detonation (when)
        iii. Targeted reason (why)
        iv. Who is calling (who)
    c. Be alert for any information regarding the call like voice characteristics or background noises
    d. Keep caller on line as long as possible before hanging up (allowing for tracing of call origin)

POWER OUTAGES (Plants, Warehouse, Garages, Offices)

In the event of a power outage, the emergency lighting will automatically come on. Flashlights should be retrieved for additional light sources.

All lift trucks should be parked. Turn off motors, engage parking brake but leave lights on before dismounting.

All affected employees will exit the building and proceed to the assembly area for headcount.

PANDEMIC

Refer to Conewago Infectious Disease Plan. Contact Safety Department and/or HR

Aerial Lift Program

I. Purpose

The purpose of this program is to ensure that all activities requiring the use of aerial lifts are conducted in a safe manner so as to minimize risk to personnel and property.

II. Definition

An aerial lift is a mechanical, vehicle-mounted device, which is used to position personnel. An aerial lift can be telescopic, articulating, or both. NOTE: Scissors lifts are considered mobile scaffolds. With the exception of Section III, SS: C (Fall Protection), this program pertains to the operation of scissors lifts as well as aerial lifts (manlifts).

III.Requirements

Training

Training shall be conducted at the direction of the Safety Director and designated personnel who have demonstrated their competency in the operation of aerial lifts and motorized scaffolds.

Employees-in-training must be supervised by a competent operator until completing the certification process.

Company certification to operate aerial lifts requires:

a. Classroom Instruction
b. Practical testing
c. Written examination

Only trained and authorized personnel are permitted to operate aerial lifts and motorized scaffolds. Training shall include:

a. Hazard recognition, including electrical hazards and falling object hazards.
b. Fall Protection Systems.
c. Material handling and load capacities.
d. Any other pertinent requirements specific to the aerial lift manufacturer (see owner's manual), work location, or any other existing conditions.
e. Recertification as needed based upon operator performance.

Inspection and Maintenance

Operators are required to inspect the aerial lift before each use and report all mechanical problems before use.

Fall Protection

A personal fall arrest system, including a safety harness and lanyard, shall be worn when working from an aerial lift or a scissors lift. **NOTE:** Belting off to an adjacent pole, structure, or equipment while working from an aerial or scissor lift is not permitted.

IV. Responsibilities

1. Safety Director
   a. Maintain training records.
   b. Insure authorized employees have been trained to operate aerial lifts.
   c. Re-train and re-test operators per OSHA regulations and Conewago policy.

2. Superintendents, Foremen, Crew Leaders
   a. Responsible for ensuring employees under their supervision comply with this policy and its procedures.

3. Employees
   a. Follow all safety procedures when operating an aerial lift.

V. Rules pertaining to the Safe Operation of Aerial Lifts (The rules are not all-inclusive.)

1. Before use each day or at the beginning of each shift, the aerial lift shall be given a visual inspection and functional test including but not limited to the following:
   Operating and emergency controls
   Safety devices including back-up alarms
   Personal protective devices
   Air, hydraulic and fuel system leaks
   Cables and wiring harness
   Loose and missing parts
   Tires and wheels
   Placards, warnings, control markings and operating manual(s).
   Outriggers, stabilizers, extendable platforms, and other structures.
   Guardrail system
   Items specified by the manufacturer.
   Any problems or malfunctions that affect the safety of operations shall be repaired prior to the use of the aerial platform.

2. All personnel in the aerial lift platform shall wear personal fall protection and other essential safety gear as required.

3. Care shall be taken to prevent rope, electric cords, and hoses from becoming entangled in the aerial platform.

4. Do not exceed rated capacities.

5. The operator shall ensure the area surrounding the aerial lift is clear of personnel and equipment when raising and lowering the platform.

6. When other moving equipment and vehicles are present, special precautions shall be taken. Warnings such as, but not limited to, flags, caution tape, safety cones. spotters and barricades shall be used.

7. Aerial lifts will not be positioned against another object to steady the lift.

8. The engine shall be shut down while fuel tanks are being filled. Fueling shall be done in a well-ventilated area free of flame, sparks, or other hazards which may cause fire or explosion.

9. The aerial lift shall not be used as a crane.

10. When driving an aerial lift, the operator shall use care and caution, being aware of existing conditions such as congestion, visibility, slope, personnel, and other factors causing hazards. Spotters should be used when 1 or more of these conditions exist.

11. Stunt driving and horseplay are not permitted.

12. If the platform or elevating assembly becomes caught, snagged, or otherwise prevented from normal motion all personnel shall be removed from the platform before attempts are made to free the platform.

13. In the event of an emergency involving an aerial lift, all work shall halt, and all available resources will be focused on resolving the emergency.

14. In the event of a fall from the lift the employee involved in the fall shall release the suspension trauma straps on the sides of their harness and step into them if able to do so. The employee should yell for help and any lifts in the immediate area should move to employee involved in the fall for rescue. At this time all lift operations stop until the employee has been rescued and returned to ground level. First responders will take over from there and “event” procedures will be put in place to address any injuries.

15. Ensure there is adequate clearance from all obstructions.

16. Maintain a minimum 10-foot approach distance from all power lines and parts maintained. This approach distance may increase as appropriate.

17. All lifts are to be operated within the manufacturer’s recommendations and within any specified limits.

18. Outriggers, stabilizers, extendable axles, or other stability enhancing means are to be used as required by the manufacturer.

19. All materials in the lift basket must be secured flat in the bottom below the toe board, or secured using attachments that are designed and tested to carry such

Asbestos Operations and Management Plan

Applicability

This Asbestos Operations and Management Plan applies to workplaces where asbestos-containing materials (ACM) are in good condition (nonfriable) and air concentrations of asbestos are below the permissible exposure limit (PEL) and/or excursion limit, but where presumed asbestos-containing material (PACM) may be present. It addresses the responsibilities of service, custodial, maintenance, and other workers who are exposed to ACM and PACM while performing work in buildings and facilities where ACM have been controlled and PACM have been identified. Such activities are covered under the Occupational Safety and Health Administration's (OSHA) workplace safety rule for asbestos (29 CFR 1910.1001) in general industry workplaces.

This plan applies to office buildings, retail stores, apartment buildings, healthcare facilities, and other facilities that include ACM and could include PACM. This plan does *not* apply to:

- Schools with ACM or PACM.
- Workers who use, remove, abate, and/or dispose of friable and nonfriable ACM, ACM debris, and PACM.
- The shipyard industry and workers who perform construction activities. These workplaces are covered under separate asbestos standards (29 CFR 1915.1001 and 29 CFR 1926.1101, respectively).

The types of ACM and PACM that could exist in buildings and facilities subject to this plan can be categorized as:

- **Surfacing materials.** Examples can include ACM that is applied onto surfaces such as decorative plaster, acoustical ACM, caulk, spackle, and fireproofing materials on structural parts of the building.
- **Thermal system insulation.** Examples can include ACM applied to pipes, boilers, tanks, and ductwork.
- **Other ACM.** Examples can include asbestos-containing floor or ceiling tiles, electrical and sound insulation materials, wallboard, panels, siding, fireproofing materials, and roof materials.

Plan Elements

This plan includes regulatory requirements of OSHA's general industry asbestos standard at 29 CFR 1910.1001, as well as best management practices in connection with:

- Notification to employees as to where ACM is located.
- Training for those working in areas where asbestos may be present (e.g., custodial and maintenance workers)
- Inspecting and monitoring the condition of ACM
- Jobsite controls and safe work practices
- Recordkeeping

[Conewago Enterprises]

Asbestos Operations and Management Plan

Table of Contents

Authority and Scope

Regulation: 29 CFR 1926.1101 Asbestos

Scope: This Asbestos and Operations Management Plan (the Plan) establishes minimum requirements for individuals working in areas where asbestos may be present. This includes, but is not limited to, service and custodial workers and employees performing minor maintenance of nonfriable asbestos-containing materials (ACM) and presumed asbestos-containing material (PACM).

This Plan does *not* cover individuals working in schools that contain ACM and/or PACM; workers who use, remove, abate, and/or dispose of friable and nonfriable ACM, ACM debris, and/or PACM; the shipyard industry; or construction industry workers. These workers are all covered under separate asbestos standards and regulations, listed below.

- The Asbestos Hazard Emergency Response Act (AHERA)—required for management of ACM in schools
- The Asbestos School Hazard Abatement Reauthorization Act (ASHARA)
- 29 CFR 1915.1001—Occupational Safety and Health Administration (OSHA) asbestos standard for shipyard industry employment
- 29 CFR 1926.1101—OSHA asbestos standard for construction industry employment

Policy Statement

It is the policy of Conewago Enterprises to comply with all applicable regulations regarding asbestos management and to prevent employee illness and environmental damage from exposure to asbestos-containing materials (ACM) and presumed asbestos-containing material (PACM). This organization will ensure that no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter (f/cc) of air as an 8-hour time-weighted average (TWA) or in excess of 1.0 f/cc of air as averaged over a sampling period of 30 minutes.

Contact with ACM will be restricted to only those personnel who have been properly trained. Conewago Enterprises will provide sufficient training and communications to ensure that this policy is effectively implemented.

Conewago Safety Director will ensure that contact with ACM, whether in restricted or nonrestricted areas, is conducted in accordance with the applicable OSHA requirements for such work.

Due to the infrequent need to perform asbestos removal, Conewago Enterprises has determined that it is not cost-effective to perform or maintain the training, licenses, equipment, and other related activities needed for site personnel to perform asbestos remediation. Instead, Conewago Enterprises will use the services of a professional remediation contractor to perform asbestos-related work as required.

Plan Administration

Program Contact Information

Function	Name/Job Title	Phone Number
Plan Administrator	Christy Clingan / Safety Director	717-632-7722
Asbestos Management Supervisor	Project Managers	717-632-7722

Roles and Responsibilities

Plan Administrator: In connection with this Plan, the Plan Administrator will:

- Manage this Plan and worker exposure issues.
- Maintain the Facility Asbestos Site Survey (FASS) database and files.
- Track ongoing asbestos minor maintenance activities, oversee compliance with regulatory requirements, and update the asbestos survey database.
- Provide guidance on regulatory occupational health requirements.
- Audit contractor performance in the event of an asbestos abatement project.
- Review control measures in operations involving ACM.
- Provide sampling and analysis support to identify ACM.
- Conduct periodic visual observations of the condition of ACM.
- Provide guidance on the requirements of federal, state, and local environmental regulations.
- Obtain and manage minor maintenance work requests and authorizations.
- Respond promptly if there are ACM release incidents.
- Ensure that employees working in the presence of ACM receive the training specified for their operations.

Asbestos Management Supervisor: In connection with this Plan, the Asbestos Management Supervisor will ensure that:

- ACM that may be disturbed during any custodial, minor maintenance, or other activities is identified in the scope of work and is removed, if required, only by qualified asbestos abatement or maintenance workers.
- Survey protocols are conducted in accordance with all requirements.

Plan Review and Update

This Plan will be reviewed annually by the Administrator to ensure the program's effectiveness and will be updated as needed. The Plan Revision Log will be used to record all updates.

Definitions

Accessible ACM—This means that the ACM is not enclosed (such as above ceilings/behind walls).

AHERA–Asbestos Hazard Emergency Response Act – required for management of ACM in schools.

Asbestos—includes chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos, and any of these minerals that have been chemically treated and/or altered.
Asbestos-containing material (ACM)—any material containing more than 1 percent asbestos.

Building/facility owner—the legal entity, including a lessee, that exercises control over management and recordkeeping functions relating to a building and/or facility in which activities covered by this standard take place.

Competent person—one who is capable of identifying existing and predictable hazards in the surroundings or working conditions that are unsanitary, hazardous, or dangerous to employees and who has authorization to take prompt corrective measures to eliminate them.

Employee exposure—exposure to airborne asbestos that would occur if an employee were not using respiratory protective equipment.

Excursion limit (ELT)—an airborne concentration of asbestos in excess of 1.0 f/cc of air as averaged over a sampling period of 30 minutes.

Fiber—a particulate form of asbestos 5 micrometers or longer with a length-to-diameter ratio of at least
3 to 1.

Friable ACM—any materials containing asbestos that can be crumbled, pulverized, or reduced to powder by hand pressure and are therefore likely to emit fibers. Friable ACM has little structural strength and contains asbestos fibers that are readily released upon breaking.

High-efficiency particulate air (HEPA) filter—a filter capable of trapping and retaining at least 99.97 percent of 0.3-micrometer-diameter mono-disperse particles.

Minor maintenance—a task or an activity during which ACM could be accidently disturbed. This does not include remediation, construction, demolition, or renovation activities.

Nonfriable ACMs—any materials containing asbestos that cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Permissible exposure limit (PEL)-an airborne concentration of asbestos in excess of 0.1 f/cc of air as an 8-hour time-weighted average (TWA).

Presumed asbestos-containing material (PACM) —certain materials found in buildings constructed no later than 1980. These materials include thermal system

insulation, surfacing material, roofing and siding shingles, vinyl floor tiles, plaster, cement, putties and caulk, ceiling tiles and spray-on coatings, industrial pipe wrapping, heat-resistant textiles, and automobile brake linings and clutch pads. The designation of a material as “PACM” may be rebutted pursuant to 29 CFR 1910.1001(j)(8).

Regulated area—an area established by the employer to demarcate areas where airborne concentrations of asbestos exceed, or there is a reasonable possibility they may exceed, the permissible exposure limits.

Surfacing ACM—surfacing material that contains more than 1 percent asbestos.

Surfacing material—material that is sprayed on, troweled on, or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members or other materials on surfaces for acoustical, fireproofing, and other purposes).

Thermal system insulation (TSI)—ACM applied to pipes, fittings, boilers, breeching, tanks, ducts, or other structural components to prevent heat loss or gain.

Thermal system insulation ACM—thermal system insulation that contains more than 1 percent asbestos.

Time-weighted average (TWA)—an airborne concentration of asbestos in excess of 0.1 f/cc as averaged over an 8-hour workday.

Hazard Assessment and Asbestos Health Risks

All friable ACM that presented an acute hazard has been encapsulated or abated at this facility. ACM at this facility is in good condition (nonfriable) and below the PEL and/or excursion limit. PACM may also be present.

NOTE: Conewago plants, garage, warehouse and offices have no asbestos, either ACM or PACM. This policy is intended to inform employees that may be exposed to asbestos while updating, remodeling or doing maintenance on existing buildings belonging to customers of Conewago.

Hazard Assessment

A third-party contractor will conduct a hazard assessment of all work areas for the potential exposure of workers to asbestos. The results of the hazard assessment will include an inventory of locations of nonfriable ACM and PACM in the facility. See the facility's **Hazard Assessment Survey** and **Asbestos Inspection Survey Record** for more information. To equip them with the information needed to perform their jobs safely, employees involved in cleaning, minor maintenance, and other such tasks that may accidentally disturb ACM will be provided with both the assessment and the survey.

Asbestos is a generic term applied to a number of naturally occurring mineral silicates that are resistant to heat and corrosion and, when crushed or processed, separate into fibers. The most common types of asbestos are chrysotile, amosite, and crocidolite. All forms of asbestos tend to break down into tiny fibers that suspend in the air and can be inhaled or swallowed. Asbestos may be found in valve packing, gaskets, boiler laggings, pipe coverings, brake linings, shielding materials, insulating boards, roofing products, protective clothing, certain cement products, heat insulation, fireproofing materials, patching and taping compounds, roofing products, floor tiles, and ceiling panels/tiles.

Health Risks

Asbestos is not believed to pose a health hazard unless it gets into the air and is inhaled or swallowed. Breathing asbestos fibers increases the risks of developing lung cancer (especially in active smokers), mesothelioma (a cancer of the lung lining), and asbestosis (chronic lung disease).

Asbestos fibers are aerodynamic, light, and hollow on the inside, which permits them to float and stay airborne. Asbestos is most dangerous when it is airborne and presents a significant risk to human health. The adverse health effects associated with exposure to asbestos include respiratory diseases, such as asbestosis, lung cancer, and mesothelioma. Asbestos is also believed to be linked to cancers of the larynx, esophagus, stomach, and colon/rectum. Because these diseases do not develop immediately after inhalation of asbestos fibers, it may be 20 years or more before symptoms become apparent. Although studies have linked high levels of exposure to asbestos in the workplace with these diseases, there is still uncertainty concerning the development of disease from low levels of exposure. Low-level exposure would include the average exposure to asbestos fibers for individuals working in buildings with ACM.

Training

Note to employer/Plan Administrator: *Each employee who is exposed to airborne concentrations of asbestos at or above the PEL and/or excursion limit must be trained in accordance with the requirements of 29 CFR 1910.1001(j)(7). Additionally, employees who perform housekeeping operations in an area containing ACM or PACM but not at the PEL must also be provided with an asbestos awareness training course that includes the requirements set forth in 29 CFR 1910.1001(j)(7)(iv).*

Employees Working in Areas Where Asbestos Is Present

Training will be provided to all workers who may be exposed to asbestos. There are two levels of training for such workers: awareness level and operation and maintenance level.

Awareness Level

All personnel (electricians, custodians, plumbers, etc.) who work in a building that contains ACM (whether or not they are required to work with ACM) and are involved in cleaning and minor maintenance tasks where ACM could be accidently disturbed are required to receive asbestos awareness training. The awareness training will include:

- Background information on asbestos—its form, uses, and health effects associated with exposure, including the relationship between smoking and exposure to asbestos in the development of lung cancer;
- Locations of ACM and PACM in the facility;
- Communication of asbestos hazards, as specified in 29 CFR 1910.1001(j);
- Recognition of damage, deterioration, and delaminating of ACM;
- Regulatory requirements relating to housekeeping (i.e., within OSHA's general industry asbestos standard);
- The proper response to fiber release episodes;
- The specific controls and written procedures in place to protect employees from exposure to asbestos, such as appropriate work practices, emergency and cleanup procedures, and PPE to be used;
- The purpose, proper use, and limitations of respirators and personal protective equipment (PPE), if appropriate;
- How to use, remove, and dispose of PPE, if appropriate;
- The requirements for posting asbestos warning signs and affixing labels and the meaning of the required legends for such signs and labels; *and*
- Name and telephone number of the Plan Administrator.

Training frequency. Each service, custodial, and maintenance employee must be trained before or at the time of hire and receive a refresher course at least once a year.

Operation and Maintenance Level

Service or maintenance workers who conduct any activities that could possibly result in the accidental disturbance of ACM should receive awareness training and additional instruction on the following:

- The nature of operations and specific tasks employees perform that could result in an accidental disturbance of ACM;
- Description on proper methods of handling ACM and how to avoid an accidental disturbance of ACM;
- Information on use and hands-on training in the use of respiratory protection, other personal protection measures, and good work practices; *and*
- 40 CFR 61 Subpart M (National Emissions Standards for Hazardous Air Pollutants (NESHAP)).

Additional Information for Employees

Employees will be provided with a copy of this Plan and:

- Self-help smoking cessation program material and contact information for public health organizations that provide information;
- A copy of the OSHA asbestos standard for general industry, 29 CFR 1910.1001; *and*
- A copy of the Conewago Enterprises Respiratory Protection Program, if applicable.

Inspections and Surveillance

There is no required frequency for inspections of ACM at public and commercial buildings.

The Plan Administrator or designee will conduct visual observations when necessary, such as when requested to determine whether ACM is present or could be disturbed by a certain custodial, service, or maintenance project activity.

Inspections

Inspection includes observing and touching all materials suspected to contain asbestos, identifying the types of such materials, either sampling or assuming suspect materials to contain asbestos, quantifying the suspect materials, and documenting their location(s).

Accreditation as an asbestos inspector is required before performing an inspection. Asbestos field investigation criteria established for inspection and reinspection and sampling will be in accordance with AHERA standards.

If additional asbestos is found, it will be abated immediately by a certified company when an acute hazard exists, or it will be managed in place until a permanent solution is chosen. ACM managed in place, however, presents opportunities for ACM to be damaged or to change in physical condition. For this reason, Conewago Enterprises requires jobsite exposure controls and safe work practices, as specified in this Plan.

See the facility **Asbestos Inspection Survey Record** for details.

Periodic Surveillance

[***Note:*** *Facilities built after 1980 usually do not require periodic surveillances*.]

The Plan Administrator or designee will perform periodic surveillances as necessary to maintain up-to-date information to assess the condition for potential future disturbance and health risk. The periodic surveillances can be performed by a nonaccredited service, custodial, maintenance, and other workers if observations are conducted only visually. Accredited individuals can collect samples or touch the areas to determine whether the ACM has become friable.

Each person performing periodic surveillance will:

- Visually inspect all areas that have been identified as ACM and/or PACM.
- Record the date of the surveillance, his or her name, and any changes in the condition of the materials.
- Submit to the Plan Administrator a copy of such record for inclusion in this Plan.

See the facility **Asbestos Periodic Surveillance Record** for details.

Warning Signs

At the entrance to mechanical rooms and areas in which employees can reasonably be expected to enter and that are known to contain nonfriable ACM and/or PACM, signs will be posted that identify the material that is present; its location; and appropriate work practices that, if followed, will ensure that ACM and/or PACM will not be disturbed. In addition, signage will state:

DANGER
ASBESTOS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
AUTHORIZED PERSONNEL ONLY

Optional: In addition, where the use of respirators and protective clothing is required in the area containing ACM and/or PACM, warning signs will also include the following statement:

RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA

Warning Labels

Labels will be affixed to any raw materials, mixtures, scrap, waste, debris, and other products containing asbestos fibers, or to their containers, so that employees are made aware of these ACM. This includes previously installed ACM or PACM in the facility. Labels will state:

DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST

[***Note:*** *Labels are not required for products that contain asbestos in concentrations of less than 1 percent or if asbestos fibers have been modified by a bonding agent, a coating, a binder, or another material that can reasonably be expected to prevent the release of asbestos fibers into the air in concentrations that meet or exceed the established PEL and/or excursion limit.*]

All employees working in and contiguous to these areas will be trained to understand the warning signs and labels. Signs and labels will include foreign languages, pictographs, and graphics, if necessary. See the facility **Hazard Communication Program** for more information.

Jobsite Exposure Controls and Safe Work Practices

All employees who perform custodial, minor maintenance, and any other tasks that may expose them to ACM will implement procedures for ensuring work that could potentially disturb ACM is performed in a manner that minimizes the possibility of ACM disturbance and maintains ACM in good condition.

Before an activity is started in an area with ACM, the activity must be approved by submitting a completed Job Request Form for Maintenance Work to the Asbestos Management Supervisor. If the job has been approved, the Asbestos Management Supervisor or a designated supervisor qualified by training or experience will visit the worksite when the work begins to see that the job is being performed properly.

See the facility **Asbestos Maintenance Work Request Form** for details.

Required Safety Procedures

These procedures must be followed:

- Avoid actions that could disturb the ACM (e.g., do not push furniture, ladders, or equipment against the ACM, and do not damage thermal system insulation).
- Immediately report any evidence of disturbance or damage to ACM to the Asbestos Management Supervisor.
- Sanding of asbestos-containing floor material is prohibited.
- Stripping of finishes will be conducted using low-abrasion pads at speeds lower than 300 revolutions per minute (rpm) and wet methods.
- After stripping and before application of new wax, the floor will be thoroughly cleaned while wet.
- Burnishing or dry buffing may be performed only on asbestos-containing flooring that has sufficient wax finish so that the pad cannot contact the ACM.
- Carpeting must be removed carefully so as not to detach asbestos floor tiles.
- If asbestos floor tiles become detached, notify the Asbestos Management Supervisor immediately.

Minor Maintenance Tasks

These maintenance activities relating to nonfriable ACM and/or PACM are activities that are of a small scale, are usually short in duration, and are sometimes unscheduled. Performance of minor maintenance tasks is unlikely to cause disturbance of the ACM. Examples of such activities could include:

- Sealing, painting, and coating so as to maintain the condition of the nonfriable ACM;
- Cleaning leaves from gutters of ACM cement roofs;
- Removing and replacing asbestos-containing machinery components such as a gasket or brake;
- Removing and disposing of small, isolated pieces of ACM found on the facility premises;

- Working on electrical mounting boards with ACM;
- Removing screws, brackets, fixtures, and other wall fasteners from walls with ACM;
- Cutting a small hole in an asbestos-containing wall to install wiring;
- Installing a light switch; *and*
- Removing an asbestos-containing tile to install a plumbing fixture.

Reporting Damage

An employee who causes or observes damage to ACM resulting from disturbance, physical impact (e.g., drilling, water leaks), vibration, or other sources is required to report such damage immediately to the Asbestos Management Supervisor. Common examples of damage could include loose or chipped floor tile; crumbling plaster; rips; cracking, flaking, blistering, or peeling of asbestos-containing material; and unwrapped thermal system insulation. The material will be inspected to determine an appropriate remedy, such as repair or encapsulation. Employees must never handle the material.

Protective Measures

Employees who notice damaged or deteriorating ACM should take these protective measures to ensure employee safety:

- Immediately warn people in the area to leave.
- Block access to the area.
- If there are no electrical hazards, wet the asbestos material with a water spray.
- Shut down the ventilation system for the area.
- Notify the Asbestos Management Supervisor.

Exposure Response Procedure

Initial Contact with ACM

There is the potential for finding previously unidentified asbestos. This can occur in instances when ACM was painted over or encapsulated with colored sealant, is concealed behind a suspended ceiling, and is discovered when damaged materials/areas become noticeable or accidentally damaged or when conducting operation, maintenance, and repair activities. The serious potential health risk associated with exposure to asbestos fibers makes it imperative to follow the procedures below when encountering asbestos during normal operation and maintenance activities.

Stop Work Procedure

Stop work whenever work activity involves materials that could contain asbestos. Immediately inform the Plan Administrator or Asbestos Management Supervisor. If the project is under a contract agreement, crew and workers will immediately inform the contractor supervisor.

Response to Initial Contact Notification

Upon receiving information that a material may contain asbestos, the Plan Administrator or designee will implement the following actions:

1. Verify that the activity is stopped that could result in the release of asbestos fibers.
2. Visually inspect the area or material of concern to determine the exact location, type of material, appearance, condition, and activity.
3. Consult the asbestos files for records of sampling and/or positive identification of ACM previously conducted in an area or a material of concern.
4. If the asbestos files indicated negative sampling results for ACM in the confirmed area or material of concern, notify the appropriate personnel to halt further action, and authorize when to resume work. Conewago Safety Director will document the inquiry for the record. If new sampling is conducted, update the asbestos files to record negative results.
5. If there is no record in the asbestos files for the location, conduct a visual observation to determine the location of suspect ACM, and request sampling for ACM.
6. If the asbestos files indicate there is material previously evaluated to be ACM or when the returned sampling analysis tested positive for asbestos, consult with Conewago Safety Director to establish subsequent action.
7. Document the findings and update the asbestos files.

Interim Measures

The Plan Administrator or designee will implement the following temporary measures to minimize further damage and release of fibers pending a response action:

- Protect and secure the activity site until implementation of the response action, and place proper asbestos warning signs and labels to deter people from entering the site area.
- Coordinate with building or facility managers, the contract supervisor, and the project engineer/manager, to alert others of the potential hazard and provide basic information to workers and employees located in the immediate area where asbestos is present. Building occupants who are aware of the presence of ACM are less likely to disturb the material.
- Conduct a visual observation of the area and institute precautionary measures to protect nearby employees from risk of exposure, or plan to evacuate personnel from the risk area, if necessary.

Response Action

The Plan Administrator or designee will develop a response plan and recommend appropriate response or abatement action based on hazard ranking, prioritized tasking, or immediate health risk.

The next course of action, once the response measure is determined, is as follows:

- Prepare the appropriate work order request forms for abatement, and coordinate with appropriate asbestos key personnel on project scoping for funding and contracts.
- For projects involving construction or large abatement projects, Project Managers coordinate with Foreman to ensure abatement and cleanup activities are in accordance with facility policies and applicable regulations.
- Review documentation to ensure proper asbestos notification to regulatory agencies, permits, training, and certification are in order before starting work.
- Conduct final clearance inspection if removal is the response action and air monitoring is conducted.
- Ensure the waste disposal procedures described in 40 CFR 763, Appendix D are strictly followed by the asbestos abatement company.
- Review all documents and reports on asbestos-related activities for completeness and compliance, for filing, and for required updates to the asbestos files.
- If abatement is needed, contact a certified company to ensure compliance with applicable regulatory requirements.

Recordkeeping

The Plan Administrator or designee will maintain the following asbestos-related files and records:

- Monitoring data, if applicable
- Hazard assessments
- Asbestos inspection surveys
- Periodic surveillance documents
- Asbestos permits and permit data
- Training records
- Maintenance requests for jobs that may disturb asbestos
- Plan updates/revisions

These records will be kept *electronically* for 5 *years.*

Plan Revision Log

Version Number	Release Date	Reason for Revision	Sections Affected	Prepared By	Approved By
1	**3/13/24**	Initial policy	All	cclingan	

Supporting Materials

Sample Hazard Assessment Survey – as needed

Sample Asbestos Inspection Survey Record - as needed

Sample Asbestos Periodic Surveillance Record - as needed

Sample Asbestos Maintenance Work Request Form - as needed

Facility Hazard Assessment

Facility Map of ACM and PACM

Facility Hazard Communication Program

Facility Respiratory Protection Program

Permit-Required Confined Space Entry Program

I. Purpose

The purpose of this program is to inform interested parties, including employees, that Conewago is complying with the OSHA Confined Space Standard. This program applies to Conewago work operations where employees must enter a permit-required confined space as part of their job duties.

II. Scope of Application

This program is designed to ensure that safe work practices are utilized during all activities regarding the permit space to prevent personal injuries and illnesses that could occur.

Examples of confined space found in our industry include (but are not limited to):

Tanks	Hoppers
Manholes	Vaults
Boilers	Pipes
Furnaces	Trenches
Sewers	Ducts
Silos	Bins
Tunnels	Pits

Environmental Hazards of these confined spaces include (but may not be limited to):

Combustibles - Methane, Hydrogen, Acetylene, Propane, Gasoline Fumes etc.
Toxic Materials - Carbon Monoxide, Hydrogen Sulfide, Welding Fumes, Corrosions, etc.
Electricity
Mechanical Hazards - Mixers, crushers, etc.
Any Oxygen deficient atmosphere - (see definition)

III. Definitions

Oxygen Deficient Atmosphere

The atmosphere tested is less than 19.5% or greater than 23.5% oxygen concentration. The range 19.5% to 23.5% is the acceptable oxygen concentration capable of safely sustaining human breathing.

Confined Space

A space that:

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

2. Has limited or restricted means of entry and exit.

3. Is not designed for continuous human occupancy

Permit-Required Confined

A confined space that has one or more of the following characteristics:

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

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

3. Has an internal configuration such that the entrant could become trapped or asphyxiated.

4. Contains any serious safety or health hazard.

Entry
The act by which a person, or any part of the body, passes through an opening into a permit-required confined space.

Entrant
The employee who will physically enter the confined space to perform the work.

Attendant
The employee who remains outside the confined space and monitors the entrant; guards the space against unauthorized entry and summons rescue personnel if needed.

Immediately Dangerous to Life and Health (IDLH)
This is any condition that poses an immediate threat to the health and/or life of an entrant; would cause irreversible health effects; or, would interfere with the entrant's ability to escape unaided from a permit space.

Entry Supervisor
Is the employee responsible for coordinating the entry into the confined space qualified? This person must be qualified by training and/or experience.

IV. Duties and Responsibilities of Persons involved in Permit-Required Confined Space Entries

Attendant Responsibilities

To monitor entrants during the job and during entry and exit to help insure their safety.

Note: The attendant shall not abandon his post for any reason while personnel are in the confined space unless relieved by another qualified attendant.

To monitor atmospheric conditions in the space prior to and during entry.

To control access to the confined space.

To summon emergency assistance as needed.

To keep records of confined space work, such as air test results, personnel entry/exit, etc.

Entrant Responsibilities

To assure that the space has been adequately ventilated, isolated, emptied, or otherwise made safe for entry.

Immediately exit a space, without question, upon word of the attendant, no matter what the reason.

To follow all safety rules and procedures that apply to the job.

To be familiar with the work to be performed and the procedures that apply to the job.

To use the appropriate PPE whenever necessary.

Entry Supervisor's Responsibilities

To assure adequate protection is provided to the entrants by verifying adequate lockout/tagout and that all hazards are securely isolated.

To support the attendant's authority in controlling access to a confined space.

To verify that all personnel have exited prior to closing the space.

To assure that all personnel involved are aware of the hazards associated with the space.

To assure that rescue services are available prior to entry.

Notification Procedures

Before a permit required confined space is entered:

Call 911 to determine the rescue unit first due in the area of the jobsite.

Provide emergency rescue personnel with the following information:

- Address of the jobsite and pertinent landmarks to assist in locating the jobsite.
- Name of the designated contact person onsite.
- Time of entry and exit.
- Phone number of the jobsite.
- Any other pertinent information that would be helpful in making a speedy response (procedures may vary depending on local Emergency Control Center requirements).

Special Note: Employees will not attempt a permit-required confined space rescue by entering the space.

V. Permit-Required Confined Space Entry Procedure

A. Isolate the space

1. Close valves.
2. Empty the space (depressurize, vent, bleed, drain).
3. Lockout/tagout (disconnect).
4. Clean residue from the space.

B. Conduct a briefing

1. Attended by attendants, entrants, and entry supervisor.
2. Review hazards of entry and work to be performed.
3. Review personal protection equipment.
4. Review procedure for contacting rescue.
5. Verify rescue personnel have been placed on-call.
6. Complete permit.

C. Complete Entry Permit Form

1. Permit must be filled out completely and correctly prior to entry.

2. To be activated, the permit must be signed by the entry supervisor.

3. No entry allowed without a valid permit.

4. Permits are valid for 1 workday.

.

5. When work is completed the permit form should be returned to the Safety Dept. where it will be filed according to job.

D. Evaluate the Space Test

the atmosphere for:

1. Oxygen - content must be at least 19.5% and no more than 23.5%

2. Combustibles – no more than 10% of the LEL (Lower Explosive Level)

3. Toxic Gasses - carbon monoxide (less than 35 ppm)

4. Any other hazardous materials as determined by the use of the space.

Note: Anytime a limit is exceeded, no matter what the reason, all personnel shall immediately exit the space and no one shall enter until atmospheric conditions are returned to safe levels.

Atmospheric Testing shall be performed:

1. Prior to every entry when the space is vacant.

2. After a 10 minute ventilation period (if ventilation is necessary).

3. At least hourly for permit-required confined spaces or more frequently if conditions or suspicions warrant.

Atmospheric Testing will be done in three (3) locations:

1. At the opening or entrance of the confined space.

2. At an estimated halfway point into the space.

3. As close to the bottom as possible without putting the probe into any sediment that may block the probe.

E. Ventilate the Space

All unsafe atmospheres must be continuously ventilated by mechanical ventilation (fans).

Ventilation air supply must be from fresh uncontaminated air (e.g. no exhaust fumes from generators or vehicles that contain carbon monoxide and other potentially harmful contaminants).

Continuous ventilation and atmospheric monitoring are required where conditions dictate, such as:

- When organic solvents are used in the work procedure
- The confined space is next to a highway or near running equipment
- Fumes, vapors or other harmful contaminants are introduced to the space by the entrant (e.g. welding)

Oxygen Deficient Atmospheres

When natural or mechanical ventilation is not a sufficient means of elevating the oxygen level to 19.5%, no employee shall enter such a confined space unless they are trained in the use of an approved (SCBA) Self-Contained Breathing Apparatus.

F. Enter the Space and Proceed with Work

The attendant shall be posted near the entrance for the duration of the work. He shall be in constant communication with the entrant(s) while the job is in progress.

All entrants shall sign the sign-in log when entering the space and sign-out when exiting.

The attendant shall maintain the permit and sign-in log during the duration of the work.

G. When the Job is Complete

Remove all personnel, tools and debris from the space. Sign off the log.

Close the space.

Cancel the permit.

Review the procedure with all participants.

VI. Emergency Rescue Procedure for Confined Spaces

Prior to entry into a permit-required confined space, everyone assigned to the operation must receive instruction as to the nature of the hazards involved and the necessary precautions to be taken in the use of protective and emergency equipment required.

Protective equipment includes (but is not limited to):

Hard Hat	Gloves
Safety Glasses	Hearing Protection
Respirator	Safety Harness

Emergency equipment includes (but is not limited to): Safety harnesses used in combination with a confined space rescue system comprised of tripod and rescue & recovery winch.

Every entrant shall wear the appropriate personal protection equipment.

The attendant shall check to ensure every entrant wears the appropriate PPE.

Each entrant, the attendant, and the entry supervisor will review emergency rescue procedures as part of their briefing prior to any entry. They will inspect all emergency rescue equipment to ensure it is in proper working order.

In the event of an emergency where rescue is necessary:

1. No employee shall attempt a rescue under IDLH conditions by entering the confined space.

2. The attendant will call out for any available nearby personnel to come to his assistance.

3. The attendant will maintain contact (visual or audio) with the entrant(s) and try to determine the nature of the emergency.

4. If there is no response then attempt rescue using the confined space rescue system.

5. Summon the Emergency Rescue Team previously placed on standby notice.

6. All site work operations shall cease and all company resources needed to effect a rescue shall be focused on that purpose.

   Directing emergency/rescue personnel to the location
   Provide equipment or manpower as directed by emergency personnel
   Mobilize company-wide resources

7. Company Officials shall be notified as soon as possible, but not before Emergency Responders have been contacted.

MULTI-GAS DETECTORS

Usage

1. When necessary, as in the case of Confined Space Entry, Multi-gas Detectors should be used to check for oxygen, hydrogen sulfide (hydrochloric acid), and L.E.L. of combustible gas.

2. Prior to usage, the instrument will be checked by a member of the safety department. The gas detector shall be calibrated at regular intervals.

3. The Employee's designated Confined Space Attendant or other person responsible for monitoring the instrument must be able to demonstrate knowledge of its operation and usage.

4. When the use of a multi-gas detector is necessary, the Employee is to record the meter's readings every hour on forms to be supplied by the Safety Department.

5. The completed forms are to be attached to the Confined Space Entry Permit or other permit and returned to the Safety Department.

Confined Space "Safe Entry Permit"

This permit, when completed properly, is an authorization in writing that states the Permit Required Confined Space has been tested by a qualified person; that the space is safe for entry; what precautions and equipment are required; a description of the work to be performed, and who is to be contacted in the event a rescue situation occurs.

Job Name: Job Number: Date:

Job Address: _____

PRCS Supervisor: _____

PRCS Attendant: _____ PRCS Entrant:

Name of Person testing the Confined Space Atmosphere:

Name of Person filling out this permit: _____

List Equipment to be used in this confined space entry:

_____
_____
_____
_____

Description of work to be performed within the PRCS:

_____
_____
_____
_____

Name and List All Emergency Responders and Telephone Numbers:

HOSPITAL _____

FIRE DEPARTMENT

POLICE _____

SAFETY DIRECTOR

Use the following checklist to evaluate the confined space:

DO NOT ENTER A CONFINED SPACE UNTIL YOU HAVE CONSIDERED EVERY QUESTION, AND HAVE DETERMINED THE SPACE TO BE SAFE.

YES No

( ) ( ) Is entry necessary?

Testing

( ) ( ) Are the instruments used in the atmospheric testing properly calibrated?
Gas Tester Equipment #: _____
Calibration Date: _____

( ) ( ) Was the atmosphere in the confined space tested?

( ) ( ) Was the Oxygen level between 19.5 and 23.5%?
_____ %

( ) ( ) Were toxic, flammable, or oxygen displacing gases/vapors present?
- Hydrogen Sulfide (less than 10ppm?) _____ PPM
- Carbon Monoxide (less than 35ppm) _____ PPM
- Lower Explosive Level (less than 10%) _____ %
- Other
(list)_____

_____

Monitoring

( ) ( ) Will the atmosphere in the space be monitored while work is going on?

( ) ( ) Continuously?

( ) ( ) Periodically? (If yes, give interval:)

Remember: ATMOSPHERIC CHANGES OCCUR DUE TO THE WORK PROCEDURE OR THE PRODUCT STORED. THE ATMOSPHERE MAY BE SAFE WHEN YOU ENTER, BUT CAN CHANGE VERY QUICKLY.

YES NO **Cleaning**

( ) ( ) Has the space been cleaned before entry is made?

( ) ( ) Was the space streamed?

( ) ( ) If so, was it allowed to cool?

Ventilation

( ) ( ) Has the space been ventilated before entry?

( ) ( ) Will ventilation be continued during entry?

( ) ( ) Is the air intake for the ventilation system located in an area that is free from combustible dusts and vapors and toxic substances?

( ) ( ) If the atmosphere was found unacceptable and then ventilated, was it retested before entry?

Isolation

( ) ( ) Has the space been isolated from other systems?

( ) ( ) Has electrical equipment been locked out?

( ) ( ) Have disconnects been used where possible?

( ) ( ) Has mechanical equipment been blocked, checked, and disengaged where necessary?

( ) ( ) Have lines under pressure been blanked and bled?

Clothing/Equipment

( ) ( ) Is special clothing required (boots, chemical suits, glasses, etc.)? If so, specify:

_____

( ) ( ) Is special equipment required (rescue equipment, communication equipment, etc.)? If so, specify:

_____

YES NO **Respiratory Protections**

( ) ( ) Are MSHA/NIOSH- approved respirators of the type required available at the worksites?

( ) ( ) Is respiratory protection required (e.g. air purifying, supplied air, self-contained breathing apparatus, etc.)? If so, specify type:

_____

Training

( ) ( ) Have you been trained in proper use of respirator?

( ) ( ) Have you been trained in confined space entry and do you know what to look for?

Standby/Rescue

( ) ( ) Will there be a standby person on the outside in constant visual or auditory communication with the person on the inside?

( ) ( ) Will the standby person be able to see and/or hear the person inside at all times?

( ) ( ) Has the standby person(s) been trained in rescue procedures?

( ) ( ) Will safety lines and harnesses be required to remove a person?

( ) ( ) Are company rescue procedures available to be followed in the event of an emergency?

( ) ( ) Are you familiar with emergency rescue procedures?

( ) ( ) Do you know who to notify and how in the event of an emergency?

This Confined Space Permit Application has been reviewed and entry has been approved based upon the conditions that exist as described within this document. Should conditions change, the permit shall be withdrawn, the space vacated and a new evaluation will be conducted.

Permit Authorized by: .

Electrical Safety

I. **Purpose:** The purpose of this Electrical Safety-Related Work Procedures program is to:

A. Promote an electrically safe workplace free from unauthorized exposure to electrical hazards for all employees and contractors;

B. To implement electrical safety-related work practice requirements as contained in 29 CFR 1910.331 - 335.

II. **Scope:** The provisions of this program cover electrical safety-related work practices for both qualified employees (those who have training in avoiding the electrical hazards of working on or near exposed energized parts) and unqualified employees (those with little or no such training) working on, near, or energized electrical parts.

III. **Responsibilities:**

A. The Safety Manager retains full responsibility for this program and has full authority to make necessary decisions to ensure success of the program.

B. The Production Manager is responsible for ensuring that all qualified and unqualified employees are properly trained as required by this program and OSHA 29 CFR 1910.332 – 1910.335.

C. Plant Management is responsible for ensuring that:

1. Personal protective equipment assessments include identified electrical exposures.

2. Adequate supplies of necessary personal protective equipment and other protective materials are available and periodically inspected.

3. Annual auditing of electrical work practices are conducted and recorded.

4. All equipment is installed in accordance with all applicable OSHA standards and the National Electric Code.

5. All equipment is periodically inspected to maintain safe operating condition.

6. The program and procedures are evaluated and updated annually.

7. Ensuring that employees are trained to inspect and operate the electrical equipment, which they are required to operate.

8. That electrical equipment found to be faulty is removed from service and appropriate work orders submitted.

9. Enforcing these procedures.

D. The Qualified or Unqualified Employee is responsible for:

1. Operating electrical equipment for which they have been adequately trained to operate and inspect.

2. Understanding inherent hazards of working with electricity.

3. Proper use and handling of electrical equipment that they use as well as PPE and special precautionary techniques in place to protect them.

4. Understanding limitations as it relates to knowledge and/or skills when working around electricity.

5. Reporting faulty electrical equipment to plant management.

IV. **Definitions:**

A. Premises Wiring - Installations of electric conductors and equipment within or on buildings or other structures, and on other premises such as yards, parking, and other lots, and industrial substations:

B. Wiring for Connection to Supply - Installations of conductors that connect to the supply of electricity.

C. Other Wiring - Installations of other outside conductors on the premises.

D. Optical Fiber Cable - Installations of optical fiber cable where such installations are made along with electric conductors.

E. A “qualified employee” is defined as one familiar with the construction and operation of the equipment and the hazards involved. Whether an employee is considered to be a "qualified employee" will depend upon various circumstances in the workplace. An employee, who is undergoing on-the-job training and who, in the course of such training, has demonstrated an ability to perform duties safely at his or her level of training and who is under the direct supervision of a Qualified employee is considered to be a qualified employee for the performance of those duties. Qualified and only qualified employees are permitted to work on or near exposed energized parts.

F. This program also covers work by unqualified employees on, near, or with the installations listed above.

V. **Electrical Safety-Related Work Procedure:** Safety-related work practices including Lock, Tag, and Try shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work is performed near or on equipment or circuits, which are, or may be energized. The specific safety-related work practices shall be consistent with the nature and extent of the associated electrical hazards.

A. Procedure For Working on De-energized Equipment

1. Live parts that operate at less than 50 volts to ground need not be de-energized if there will be no increased exposure to electrical burns or to explosion due to electric arcs.

2. Company Lock, Tag and Try Procedures will be followed when working on de-energized equipment.

3. For purposes of this procedure, conductors and parts of electric equipment that have been de-energized but are exposed or have not been locked out in accordance with the Lock, Tag and Try Procedures shall be treated as energized parts and the safety related work practices shall be followed.

B. Energized Parts

1. This section applies to work performed on exposed live parts (involving either direct contact or contact by means of tools or material) or near enough to them for employees to be exposed to any hazard they present.

2. If the exposed live parts are not de-energized (i.e., testing of circuits), the safety-related work practices shall be used to protect employees who may be exposed to the electrical hazards involved. These work practices are intended to protect employees against contact with energized circuit parts directly with any part of their body or indirectly through some other conductive object.

3. The work practices that are used shall be suitable for the conditions under which the work is to be performed and for the voltage level of the exposed electric conductors or circuit parts.

4. Conductors and parts of electric equipment that have been de-energized but have not been locked out in accordance with the Lock, Tag and Try Procedures shall be treated as energized parts and the safety-related work practices will be followed.

5. Only qualified employees may work on electric circuit parts or equipment that has not been de-energized using the Lock, Tag and Try Procedures. Such employees shall be capable of working safely on energized circuits and shall be familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools.

C. Overhead Lines

1. Conewago employees are not authorized to work within 10 feet of any overhead high voltage electrical service lines.

2. When a Conewago employee is to perform work near overhead lines, the lines shall be de-energized and grounded, or other protective measures shall be provided before work is started. If the lines are to be de-energized, arrangements shall be made with the organization that operates or controls the electric circuits involved to de-energize and ground them. If protective measures, such as guarding, isolating, or insulating, are provided, these precautions shall prevent employees from contacting such lines directly with any part of their body or indirectly through conductive materials, tools, or equipment, that operates or controls the electric circuits involved to de-energize and ground them.

3. When an employee is working in an elevated position near overhead lines, the location shall be such that the employee and the longest conductive object he or she may contact cannot come closer to any unguarded, energized overhead line than the following distances:

   a. For voltages to ground 50kV or below - 10 ft. (305 cm);

   b. For voltages to ground over 50kV - 10 ft plus 4 in. for every 10kV over 50kV.

4. When an employee is working on the ground in the vicinity of overhead lines, the employee may not bring any conductive object closer to unguarded, energized overhead lines than the distances listed above.

   Note: For voltages normally encountered with overhead power lines, objects, which do not have an insulating rating for the voltage involved, are

considered to be conductive.

D. Qualified Employees

1. Properly trained and designated Conewago employees are authorized to work on low voltage (600 volts and less) equipment and circuits.

2. Qualified employees are authorized to perform trouble shooting and minor adjustments of electrically energized equipment and circuits.

3. A qualified employee may not approach or take any conductive object without an approved insulating handle closer to exposed energized parts than as shown in Approach Distance for Qualified Employee - Alternating Current Table shown below unless:

   a. The employee is insulated from the energized part. Gloves, with sleeves if necessary, rated for the voltage involved are considered to be insulation of the employee from the energized part on which work is performed), or

   b. The energized part is insulated both from all other conductive objects at a different potential and from the employee, or

   c. The employee is insulated from all conductive objects at a potential different from that of the energized part.

Approach Distances for Qualified Employees-Alternating Current Table

Voltage Range (phase to phase)	**Approach Distance (Minimum)**
300 V and less:	Avoid contact
300 V to 750 V:	1 foot
750 V to 2 kV:	1.5 feet
2 kV to 15 kV	2 feet
15 kV to 37 kV	3 feet
37 kV to 87.5 kV	3.5 feet
87.5 kV to 121 kV	4 feet
121 kV to 140 kV	4.5 feet

E. Vehicular and Mechanical Equipment

1. Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines shall be operated so that a clearance of 10 ft. is maintained. If the voltage is higher than 50kV, the clearance shall be increased 4 in. for every 10kV over that voltage. However, the clearance may be reduced under the following conditions:

   a. If the vehicle is in transit with its structure lowered, the clearance may be reduced to 4 ft. for voltage rate at or below 50 KV. If the voltage is higher than 50kV, the clearance shall be increased 4 in. for every 10kV over that voltage.

b. If insulating barriers are installed to prevent contact with the lines, and if the barriers are rated for the voltage of the line being guarded and are not a part of or an attachment to the vehicle or its raised structure, the clearance may be reduced to a distance within the designed working dimensions of the insulating barrier.

c. Employees standing on the ground may not contact the vehicle or mechanical equipment or any of its attachments, unless:

(1) The equipment is located so that no un-insulated part of its structure (that portion of the structure that provides a conductive path to employees on the ground) can come closer to the line than 10 feet.

(2) If any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines is intentionally grounded, employees working on the ground near the point of grounding may not stand at the grounding location whenever there is a possibility of overhead line contact. Additional precautions, such as the use of barricades or insulation, shall be taken to protect employees from hazardous ground potentials, depending on earth resistivity and fault currents, which can develop within the first few feet or more outward from the grounding point.

F. Illumination

1. Employees may not enter spaces containing exposed energized parts, unless illumination is provided that enables the employees to perform the work safely.

2. Where lack of illumination or an obstruction precludes observation of the work to be performed, employees may not perform tasks near exposed energized parts.

3. Employees may not reach blindly into areas which may contain energized parts.

G. Confined or Enclosed Workspaces

1. When an employee works in a confined or enclosed space (such as a manhole or vault) that contains exposed energized parts, the employer shall provide, and the employee shall use, protective shields, protective barriers, or insulating materials as necessary to avoid inadvertent contact with these parts.

2. Doors, hinged panels, and the like shall be secured to prevent their swinging into an employee and causing the employee to contact exposed energized parts.

H. Conductive Materials and Equipment

1. Conductive materials and equipment that are in contact with any part of an employee's body shall be handled in a manner that will prevent them from contacting exposed energized conductors or circuit parts.

2. If an employee must handle long dimensional conductive objects (such as ducts and pipes) in areas with exposed live parts, the employer shall institute

work practices (such as the use of insulation, guarding, and material handling techniques), which will minimize the hazard.

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

J. Conductive Apparel

1. No jewelry other than stud piercings shall be worn while working in the production environment. This includes necklaces, bracelets, hoop or dangling earrings or rings of any kind. No visible piercings other than those mentioned in this policy are to be worn. The only jewelry permitted will be stud piercings.

2. Any person in the vicinity of a single piece of moving equipment for 10 minutes or longer must follow this policy. This includes contractors working in our facility. This policy will not apply to visitors or office personnel that do not come in contact with moving equipment for extended periods of time. Persons on plant tours are not required to comply. However, they are reminded that the production environment is dangerous and Conewago strongly recommends securing any loose jewelry prior to starting a plant tour.

K. Housekeeping Duties

1. Where live parts present an electrical contact hazard, employees may not perform housekeeping duties at such close distances to the parts that there is a possibility of contact, unless adequate safeguards (such as insulating equipment or barriers) are provided.

2. Electrically conductive cleaning materials including conductive solids such as steel wool, metalized cloth, and silicon carbide, as well as conductive liquid solutions) may not be used in proximity to energized parts unless procedures are followed which will prevent electrical contact

L. Portable Electric Equipment: Applies to the use of cord- and plug-connected equipment, including flexible cord sets (extension cords).

1. Portable equipment shall be handled in a manner which will not cause damage. Flexible electric cords connected to equipment may not be used for raising or lowering the equipment. Flexible cords may not be fastened with staples or otherwise hung in such a fashion as could damage the outer jacket or insulation.

2. Portable cord- and plug-connected equipment and flexible cord sets (extension cords) shall be visually inspected before use on any shift for external defects such as loose parts, deformed and missing pins, or damage to outer jacket or insulation) and for evidence of possible internal damage (such as pinched or crushed outer jacket). Cord- and plug- connected equipment and flexible cord sets (extension cords), which remain connected once they are put in place and are not exposed to damage, need not be visually inspected until they are relocated.

3. If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service, and no

employee may use it until repairs and tests necessary to render the equipment safe have been made.

4. When an attachment plug is to be connected to a receptacle (including any on a cord set), the relationship of the plug and receptacle contacts shall first be checked to ensure that they are of proper mating configurations.

5. A flexible cord with grounding-type equipment shall contain an equipment-grounding conductor.

6. Attachment plugs and receptacles may not be connected to, or altered in a manner, which would prevent proper continuity of the equipment -grounding conductor. Additionally, these devices may not be altered to allow the grounding pole of a plug to be inserted into slots intended for connection to the current-carrying conductors.

7. Adapters that interrupt the continuity of the equipment grounding connection may not be used.

8. Portable electric equipment and flexible cords used in highly conductive work locations (such as those inundated with water or other conductive liquids), or in job locations where employees are likely to contact water or conductive liquids, shall be approved for those locations.

9. Employee's hands may not be wet when plugging and unplugging flexible cords and cord-and plug-connected equipment, if energized equipment is involved.

10. Energized plug and receptacle connections may be handled only with insulating protective equipment if the condition of the connection could provide a conducting path to the employee's hand (if, for example, a cord connector is wet from being immersed in water).

11. Locking-type connectors shall be properly secured after connection.

M. Electric Power and Lighting Circuits

1. Routine opening and closing of circuits, load rated switches, circuit breakers, or other devices specifically designed as disconnecting means shall be used for the opening, reversing, or closing of circuits under load conditions. Cable connectors not of the load-break type, fuses, terminal lugs, and cable splice connections may not be used for such purposes, except in an emergency.

2. Re-closing circuits after protective device operation. After a circuit is de-energized by a circuit protective device, the circuit may not be manually reenergized until it has been determined that the equipment and circuit can be safely energized. The repetitive manual re-closing of circuit breakers or reenergizing circuits through replaced fuses is prohibited.

   Note: When it can be determined from the design of the circuit and the over-current devices involved that the automatic operation of a device was caused by an overload rather than a fault condition, no examination of the circuit or connected equipment is needed before the circuit is reenergized.

3. Over-current protection of circuits and conductors may not be modified, even on a temporary basis.

N. Test Instruments and Equipment

1. Only qualified employees may perform testing work on electric circuits or equipment.

2. Test instruments and equipment and all associated test leads, cables, power cords, probes, and connectors shall be visually inspected for external defects and damage before the equipment is used. If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service, and no employee may use it until repairs and tests necessary to render the equipment safe have been made.

3. Test instruments and equipment and their accessories shall be rated for the circuits and equipment to which they will be connected and shall be designed for the environment in which they will be used.

O. Flammable Materials

1. Electric equipment capable of igniting flammable materials near them shall not be used unless measures are taken to prevent hazardous conditions from developing. Such materials include, but are not limited to:

a. Flammable gases, vapors or liquids

b. Combustible dust; and ignitable fibers or filings

Note: Electrical installation requirements for locations where flammable materials are present on a regular basis are contained in 29 CFR 1910.307.

A. Safeguards for Personnel Protection

1. Use of Protective Equipment

a. Employees working in areas where there are potential electrical hazards shall be provided with, and shall use, electrical protective equipment that is appropriate for the specific parts of the body to be protected and for the work to be performed. Protective equipment shall be maintained in a safe, reliable condition and shall be periodically inspected or tested, as required by 29 CFR 1910.137.

b. If the insulating capability of protective equipment may be subject to damage during use, the insulating material shall be protected. (For example, an outer covering of leather is sometimes used for the protection of rubber insulating material.)

c. Employees shall wear nonconductive head protection wherever there is a danger of head injury from electric shock or burns due to contact with exposed energized parts.

d. Employees shall wear protective equipment for the eyes or face wherever there is danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from electrical explosion.

e. When working near enough to exposed energized parts that inadvertent contact might occur, employees shall wear rubber - insulating gloves, the rating of which must meet or exceed the minimum voltage level found in specific work area.

B. General Protective Equipment and Tools

1. When working near exposed energized conductors or circuit parts, each employee shall use insulated tools or handling equipment if the tools or handling equipment might contact such conductors or parts.

2. If the insulating capability of insulated tools or handling equipment is subject to damage, the insulating material shall be protected.

    a. Fuse handling equipment, insulated for the circuit voltage, shall be used to remove or install fuses when the fuse terminals are energized.

    b. Ropes and hand lines used near exposed energized parts shall be nonconductive.

    c. When normally enclosed live parts are exposed for maintenance or repair, they shall be barricaded to protect unqualified employees from contact with the live parts.

C. Alerting Techniques

1. The following alerting techniques shall be used to warn and protect employees from hazards, which could cause injury due to electric shock, burns, or failure of electric equipment parts.

    a. Safety signs, safety symbols, or accident prevention tags shall be used where necessary to warn employees about electrical hazards which may endanger them, as required by 29 CFR 1910.145.

    b. Barricades shall be used in conjunction with safety signs where it is necessary to prevent or limit unauthorized employee access to work areas exposing employees to un-insulated energized conductors or circuit parts. Conductive barricades may not be used where they might cause an electrical contact hazard.

D. Training

1. All employees whose work requirements place them within the scope of this program shall be properly trained.

2. Such employees, qualified or unqualified, will receive initial training at the time they are assigned to work.

3. The initial Training Outline for Qualified Employees is found in Tab A.

4. The initial Training Outline for Unqualified Employees is found in Tab B.

E. Periodic Evaluation: The program will be evaluated for effectiveness annually.

F. Disciplinary action: Leaders are required to document violations of this safety policy. Violations of this safety policy will be addressed according to guidelines as described in the Employee Handbook and this Safety Manual.

TAB A

QUALIFIED EMPLOYEE ELECTRICAL SAFETY TRAINING OUTLINE

Learning Objective -- Participant will understand the following:

(1) Inherent hazards of electricity, such as high voltages, electric current, arcing, grounding, and lack of guarding,

(2) How to check tools, power cords, and plugs for defects,

(3) Limitations of Unqualified Employees as if relates to working around electrical equipment,

(4) Where to get additional information about electrical hazards and to have access to the plant's Electrical Safety-Related Work Practices Program,

(5) The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment,

(6) The skills and techniques necessary to determine the nominal voltage of exposed live parts,

(7) The clearance distances specified in 29 CFR 1910.333(c) and the corresponding voltages to which the qualified person will be exposed, and

(8) Proper use of special precautionary techniques, personal protective equipment, insulation and shielding materials, and insulating tools

Instructional Methods: Lecture, discussion and written examinations

Frequency: Training is conducted at the time of job assignment. Annual refresher is conducted thereafter.

Competency Measurement: Written examination.

Competency will include knowledge of all the safety requirements contained in 29 CFR 1910.331-1910.335 and NFPA 70E. Proficiency will be measured through written examination and practical skills demonstration by the candidate. Proof of competency will be recorded on appropriate training records and maintained with other records.

Class Outline:

(1) Review general electrical safety information. (A commercial video tape may be used for this part.)

(2) Review the plant's Electrical Safety-Related Work Practices Program.

(3) Demonstrate and discuss techniques to distinguish exposed live parts from other parts of electric equipment.

(4) Demonstrate and discuss the skills and techniques necessary to determine the nominal voltage of exposed live parts.

(5) Discuss the clearance distances specified in 29 CFR 1910.333(c) and the corresponding voltages to which the qualified person will be exposed.

(6) Demonstrate and discuss the proper use of special precautionary techniques, personal protective equipment, insulation and shielding materials, and insulating tools.

(7) Candidates will demonstrate that they can use the various tools and techniques listed above through practical exercises prepared by the instructor.

(8) Written quiz.

(9) Distribute a class instructor evaluation form.

TAB B

UNQUALIFIED EMPLOYEE ELECTRICAL SAFETY TRAINING OUTLINE

Learning Objective: Participant will understand:

(1) Inherent hazards of electricity, such as high voltages, electric current, arcing, grounding, and lack of guarding,

(2) How to check tools, power cords, and plugs for defects, and

(3) Limitations of Unqualified Employees as if relates to working around electrical equipment, and

(4) Where to get additional information about electrical hazards and to have access to the plant's Electrical Safety-Related Work Practices Program.

Instructional Methods: Lecture and discussion

Frequency: Training is conducted at the time of job assignment. Annual refresher is conducted thereafter.

Class Outline:

(1) Review general electrical safety information. (A commercial video tape may be used for this part.)

(2) Review the plant's Electrical Safety-Related Work Practices Program.

(3) Discuss the limitations of Unqualified Employees as it relates to electrical work.

(4) Distribute a class instructor evaluation form.

ELECTRICAL GROUND FAULT PROTECTION

1.0 Purpose

To establish a procedure for the selection of an appropriate means of protecting the work force from electrical ground fault incidents.

2.0 Scope

This procedure applies to all Company personnel.

3.0 Responsibilities

The Supervisor/Foreman is responsible for executing, enforcing and performance of this procedure.

The Company Safety Director is responsible for administering and monitoring this procedure.

4.0 General

When an electrical ground fault occurs, the current shall flow through the path with a minimum impedance to ground. **It is imperative that an employee does not become the conductor of this current.**

There are two approved methods for protecting workers from ground fault incident. These methods are:

1. Use of ground fault circuit interrupters (GFCI or GFI).
2. An assured equipment grounding conductor program.

5.0 Definitions

Ground - a conducting connection, whether intentional or accidental, between an electrical circuit or equipment and the earth, or to some conducting body that serves in place of the earth.

Grounded Conductor - a system or circuit conductor that is intentionally grounded.

Ground Fault Circuit Interrupt - a device whose function is to interrupt the electrical circuit to lead when a fault current to ground incident occurs.

6.0 Procedure

Ground Fault Circuit Interrupter (GFCI)

1. All 120 volt, single phase, 15 and 20 amp receptacle outlets in the work environment, which are not part of the permanent wiring of the building or structure and which are

in use by employees should have approved ground fault circuit interrupters for personnel protection.

2. Receptacles on a two-wire, single phase, portable or vehicle-mounted generator, rated not more than 5 KW, where the circuit conductors of the generator are insulated from the generator frame and all other grounded surfaces are site specific and may require GFCI on all equipment.
3. Attention shall be given to the proper installation and maintenance of GFCI within the National Electrical Code (NEC). The system shall be tested prior to being put into service and the test results documented and kept on file.
4. If a fault trip-out occurs after the circuit has been tested and put into service, a thorough investigation must be made to determine the cause. The necessary repairs or corrections shall be made before reusing.
5. In purchasing GFCIs they shall conform to the Underwriters Laboratories and Standards 943, GFCI.
6. Each circuit protected by a circuit breaker GFCI requires its own neutral conductor.
7. Receptacle Type GFCI may be used on common neutral systems and where receptacles are more than 250 feet from the breaker.

Ergonomics

In an effort to understand the relationship between people, tasks, equipment and environment, Conewago has partnered with Wellspan Occupational Health to participate in a POET (Post Offer Employment Testing) program. This program is defined and described in the attached document. Conewago worked with Wellspan to develop our program to fit our workplace through observations and job descriptions. Current Conewago employees were tested to confirm the accuracy of the program. Going forward, this will be used with new hires as an aid in addressing ergonomic concerns.

WELLSPAN
Rehabilitation

Conewago and WellSpan Post-Offer Employment Testing (POET) Program

The program includes a physical abilities test for the purpose of screening new hire candidates and a baseline for functional testing after an injury. The program objective is to increase injury prevention measures and improve injury case management.

Description of Physical Demands Analysis

WellSpan Rehabilitation observed on site to capture load and force measurements for specific work processes through a review of existing job descriptions to determine the essential functions and areas of focus and determined issues and coordinated the onsite job analyses.

Development of Preliminary Test Protocol(s)

WellSpan Rehabilitation developed a content-valid, job-specific test protocol. This protocol is a step-by-step template of tests to measure an individual's physical capacities for each essential job function.

Sample Population Testing

Existing employees were tested to validate the testing process and to rule out disparate impact issues. Employees tested were randomly selected but represented the demographics of the workforce. The testing process included informed consent from the volunteer employee, completion of a medical screening questionnaire, and then completion of the test protocol while under heart rate monitoring. The protocol developed for the physical demands testing was entered into WellSpan Rehabilitation's computerized equipment to ensure standardization. Additionally, all test providers were instructed in the specific test administration and reporting procedures.

Validation of Findings and Standardization of testing

Test results were validated through the Current Employee testing and standardized to allow testing of new hire employees prior to beginning work on-site.

Program Implementation and Management

Scheduling of tests is facilitated between Conewago Enterprises, Inc. or Conewago Manufacturing, LLC/WellSpan Occupational Health and WellSpan Rehabilitation. Immediately following the testing, WellSpan Rehabilitation submits the Test Summary report to Conewago and will submit the Test Detail report to WellSpan Occupational Health for MRO review. Separate human resource and medical reports are provided to ensure that medical information is kept separate from the report required to determine suitability for hiring.

Excavation and Trenching

PURPOSE

This program outlines procedures and guidelines for the protection of employees working in and around excavations and trenches. This program requires compliance with OSHA Standards described in Subpart P (CFR 1926.650) for the construction industry.

Compliance is mandatory to ensure employee protection when working in or around excavations. The programs in this manual on confined space, hazard communication, lock-out/tag-out, respiratory protection, and any other safety programs or procedures deemed essential for employee protection, are to be used in conjunction with this program.

SCOPE

This program pertains to all Conewago projects that require any excavations or trenches.

REFERENCES

29 CFR 1926.650, Subpart P - Excavations
Excavation Equipment Manufacturer Safety Procedures

RESPONSIBILITIES

It is the responsibility of each superintendent and supervisor to implement and maintain the procedures and steps set forth in this program. Each employee involved with excavation and trenching work is responsible to comply with all applicable safety procedures and requirements of this program.

DEFINITIONS

BENCHING - A method of protecting employees from cave-ins by excavating the sides of an excavation to form one or a series of horizontal levels or steps, usually with vertical or near vertical surfaces between levels.

CAVE-IN - The separation of a mass of soil or rock material from the side of an excavation, or the loss of soil from under a trench shield or support system, and its sudden movement into the excavation, either by failing or sliding, in sufficient quantity so that it could entrap, bury, or otherwise injure and immobilize a person.

COMPETENT PERSON - One who is capable of identifying existing and predictable hazards in the surroundings or working conditions, which are unsanitary, hazardous, or

dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

DURATION OF EXPOSURE - The longer an excavation is open, the longer the other factors have to work on causing it to collapse.

EXCAVATION - Any man-made cut, trench, or depression in an earth surface, formed by earth removal.

HAZARDOUS ATMOSPHERE - An atmosphere which by reason of being explosive, flammable, poisonous, corrosive, oxidizing, irritating, oxygen deficient, toxic, or otherwise harmful, may cause death, illness or injury.

PROTECTIVE SYSTEM - A method of protecting employees from cave-ins, from material that could fall or roll from an excavation, or from the collapse of adjacent structures. Protective systems include support systems, sloping and benching systems, shield systems, and other systems that provide necessary protection.

SHIELD - A structure that is capable of withstanding the forces imposed on it by a cave-in and thereby protects employees within the structure. Shields can be permanent structures or can be designed to be portable and moved along as work progresses. All shields must be in accordance with 29 CFR 1926.650(c)3 or (c)4.

SLOPING - A method of protecting workers from cave-ins by excavating to form sides of an excavation that are inclined away from the excavation to prevent cave-ins. The angle of incline required to prevent a cave-in varies with differences such as soil type, length of exposure, and application of surcharge loads.

SURCHARGE LOADS - Generated by the weight of anything in proximity to the excavation, push starts for a cave-in (anything up top pushing down). Common surcharge loads:

- Weight of spoil pile
- Weight of nearby buildings, poles, pavement or other structural objects
- Weight of material and equipment

TRENCH - A narrow excavation below the surface of the ground, less than 15 feet wide, with a depth no greater than the width.

UNDERMINING - Undermining can be caused by such things as leaking, leaching, caving or over-digging. Undermined walls can be very dangerous.

VIBRATION - A force that is present on construction sites and must be considered. The vibrations caused by backhoes, dump trucks, compactors and traffic on job sites can be substantial.

GENERAL REQUIREMENTS

Before any work is performed and before any employees enter the excavation, a number of items must be checked and insured;

Before any excavation, underground installations must be determined. This can be accomplished by either contacting the local utility companies or the local “one-call” center for the area. All underground utility locations must be documented on the proper forms. All overhead hazards (surface encumbrances) that create a hazard to employees must be removed or supported to eliminate the hazard.

If the excavation is to be over 20 feet deep, it must be designed by a registered professional engineer who is registered in the state where work will be performed.

Adequate protective systems will be utilized to protect employees. This can be accomplished through sloping, shoring or shielding.

The worksite must be analyzed in order to design adequate protection systems and prevent cave-ins. There must also be an excavation safety plan developed to protect employees.

Workers must be supplied with and wear any personal protective equipment deemed necessary to assure their protection.

All spoil piles will be stored a minimum of two (2) feet from the sides of the excavation. The spoil pile must not block the safe means of egress.

If a trench or excavation is 4 feet or deeper, stairways, ramps, or ladders will be used as a safe means of access and egress. For trenches, the employee must not have to travel any more than 25 feet of lateral travel to reach the stairway, ramp, or ladder.

The walls (sides) of an excavation cannot be concealed by ANY covering while employees are working within the excavation or during any visual or physical inspection conducted by a competent person.

No employee will work in an excavation where water is accumulating unless adequate measures are used to protect the employees.

A competent person will inspect all excavations and trenches daily, prior to employee exposure or entry, and after any rainfall, soil change, or any other time needed during the shift. The competent person must take prompt measures to eliminate any and all hazards.

Excavations and trenches 4 feet or deeper that have the potential for toxic substances or hazardous atmospheres will be tested at least daily. If the atmosphere is inadequate, protective systems will be utilized.

If work is in or around traffic, employees must be supplied with and wear orange reflective vests. Signs and barricades must be utilized to ensure the safety of employees, vehicular traffic, and pedestrians.

COMPETENT PERSON RESPONSIBILITIES

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

A competent person is required to:

Have complete understanding of the applicable safety standards and any other data provided.

Assure the proper locations of underground installations or utilities, and that the proper utility companies have been contacted

Conduct soil classification tests and reclassify soil after any condition changes.

Determine adequate protective systems (sloping, shoring, or shielding systems) for employee protection.

Conduct all air monitoring for potential hazardous atmospheres.

Conduct daily and periodic inspections of excavations and trenches.

Approve design of structural ramps, if used.

EXCAVATION SAFETY PLAN

An excavation safety plan is required in written form. This plan is to be developed to the level necessary to ensure complete compliance with the OSHA Excavation Safety Standard and state and local safety standards. This information is to be used for educational purposes. Conewago policy regarding soil classification and excavation protection is more stringent. (see Conewago Enterprises Trench Shoring Requirements document)

Excavation safety plan factors:

Utilization of the local one-call system
Determination of locations of all underground utilities
Consideration of confined space atmosphere potential
Proper soil protection systems and personal protective equipment and clothing
Determination of soil composition and classification
Determination of surface and subsurface water
Depth of excavation and length of time it will remain open

Proper adherence to all OSHA Standards, this excavation and trenching safety program, and any other coinciding safety programs.

SOIL CLASSIFICATION AND IDENTIFICATION

The OSHA Standards define soil classifications within the Simplified Soil Classification Systems, which consist of four categories: Stable rock, Type A, Type B, and Type C.

Stability is greatest in stable rock and decreases through Type A and B to Type C, which is the least stable. Appendix A of the Standard provides soil mechanics terms and types of field tests used to determine soil classifications.

Stable rock is defined as natural solid mineral matter that can be excavated with vertical sides and remain intact while exposed.

Type A soil is defined as:

Cohesive solids with and unconfined compressive strength of 1.5 tons per square foot (TSF) or greater.
Cemented soils like caliche and hardpan are considered Type A.

Soil is NOT Type A if:

It is fissured.
The soil is subject to vibration from heavy traffic, pile driving or similar effects.
The soil has been previously disturbed.
The material is subject to other factors that would require it to be classified as a less stable material.
The exclusions for Type A most generally eliminate it from most construction situations.

Type B soil is defined as:

Cohesive soil with an unconfined compressive strength greater than .5 TSF, but less than 1.5 TSF
Granular cohesionless soil including angular gravel, slit, slit loam, and sandy loam.
The soil has been previously disturbed except that soil classified as Type C soil
Soil that meets the unconfined compressive strength requirements of Type A soil, but is fissured or subject to vibration.
Dry rock that is unstable.

Type C soil is defined as:

Cohesive soil with an unconfined compressive strength of .5 TSF or less.
Granular soils including gravel, sand and loamy sand.
Submerged soil or soil from which water is freely seeping.
Submerged rock that is not stable.

Soil Test & Identification

All soil is to be classified as class C soil unless a properly documented soil classification is complete confirming a higher class and showing the date, the method used to classify the soil, the competent person responsible for the classification and the final approval from the Conewago Site Project Manager or Safety Department.

The competent person can classify the soil type in accordance with the definitions in Appendix A and the paragraph above on the basis of at least on visual and one manual analysis. These tests should be run on freshly excavated samples from the excavation and are designed to determine stability based on a number of criteria: the cohesiveness, the presence of fissures, the presence and amount of water, the unconfined compressive strength, the duration of exposure, the undermining and the presence of layering, prior excavation and vibration.

The cohesion tests are based on methods to determine the presence of clay. Clay, silt and sand are size classifications, with clay being the smallest sized particles, silt intermediate and sand the largest. Clay minerals exhibit good cohesion and plasticity (can be molded). Sand exhibits no elasticity and virtually no cohesion unless surface wetting is present. The degree of cohesiveness and plasticity depend on the amounts of all three types and water.

When examining the soil, three questions must be asked: Is the sample granular or cohesive? Fissured or non-fissured? What is the unconfined compressive strength measured in TSF?

Methods of testing soils:

Visual test: If the excavated soil is in clumps, it is cohesive. If it breaks up easily, not staying in clumps, it is granular.

Wet manual test: Wet your fingers and work the soil between them. Clay is a slick paste when wet, meaning it is cohesive. If the clump falls apart in grains, it is granular.

Dry strength test: Try to crumble the sample in your hands with your fingers. If it crumbles into grains, it is granular. Clay will not crumble into grains, only into smaller chunks.

Pocket penetrometer test: This instrument is most accurate when soil is nearly saturated. This instrument will give unconfined compressive strength in tons per square foot. The spring-operated device uses a piston that is pushed into a coil up to a calibration groove. An indicator sleeve marks and retains the reading until it is read. The reading is calibrated in tons per square foot (TSF) or kilograms per cubic centimeter.

Thumb penetration test: The competent person attempts to penetrate a fresh sample with thumb pressure. If the sample can be dented, but penetrated only with great effort, it is Type A. If it can be penetrated several inches and molded by light pressure, it is Type C. Type B can be penetrated with effort and molded.

Shearvane: Measures the approximate shear strength of saturated cohesive soils. The blades of the vane are pressed into a flat section of undisturbed soils. The dial is read directly when using the standard vane. The results will be in tons per square foot or kilograms per cubic centimeter.

The soil is subject to change several times within the scope of an excavation and the moisture content will vary with weather and job conditions. **Due to the potential for these changes, Conewago considers all soil to be Type C and does not allow benching to be done. All excavations greater than 5' must be sloped at 1 ½ to 1 from the bottom of the excavation or trench. If a trench box is used, the slope will begin 18 inches below the top of the box to allow back fill on sides , preventing shifting of trench box.**

EXCAVATION PROTECTION SYSTEM

The three basic protective systems for excavations and trenches are sloping and benching systems, shoring and shields.

The protective systems shall have the capacity to resist without failure all loads that are intended or could reasonably be expected to be applied to or transmitted to the system. Every employee in an excavation shall be protected from cave-ins by an adequate protective system.

Exceptions to using protective system:

Excavations are made entirely in stable rock

Excavations are less than 5 feet deep and declared safe by a competent person.

SLOPING AND BENCHING SYSTEMS

Sloping and benching systems for excavations five (5) to twenty (20) feet in depth must be constructed under the instruction of a designated competent person.

Sloping and benching systems for excavations greater than twenty (20) feet must be designed and stamped by a registered professional engineer.

Sloping and benching specifications can be found in Appendix B of the OSHA Standard (Subpart P).

SHORING SYSTEMS

Shoring is another protective system or support system. Shoring utilizes a framework of vertical members (uprights), horizontal members (whales), and cross braces to support the sides of the excavation to prevent a cave-in. Metal hydraulic, mechanical or timber shoring is common examples.

The different examples of shoring are found in the OSHA Standard under these appendices:

APPENDIX C - Timber Shoring for Trenches

APPENDIX D - Aluminum Hydraulic Shoring for Trenches

APPENDIX E - Alternatives to Timber Shoring

SHIELD SYSTEMS (Trench Boxes)

Shielding is the third method of providing a safe workplace. Unlike sloping and shoring, shielding does not prevent a cave-in. Shields are designed to withstand the soil forces caused by a cave-in and protect the employees inside the structure. Most shields consist of two flat, parallel metal walls that are held apart by metal cross braces.

Shielding design and construction is not covered in the OSHA Standards. Shields must be certified in design by a registered professional engineer and must have either a registration plate on the shield or registration papers from the manufacturer on file at the jobsite office. **ANY REPAIRS OR MODIFICATIONS MUST BE APPROVED BY THE MANUFACTURER.**

SAFETY PRECAUTIONS FOR SHIELD SYSTEMS

Shields must not have any lateral movement when installed.

Employees will be protected from cave-ins when entering and existing the shield (examples - ladder within the shield or a properly sloped ramp at the end).

Employees are not allowed in the shield during installation, removal, or during any vertical movement.

Shields can be 2 ft. above the bottom of an excavation if they are designed to resist loads at the full depth and if there are no indications of caving under or behind the shield.

The shield must extend at least 18 inches above the point where proper sloping begins (the height of the shield must be greater than the depth of the excavation).

The open end of the shield must be protected from the exposed excavation wall. The wall must be sloped, shored, or shielded. Engineer designed end plates can be mounted on the ends of the shield to prevent cave-ins.

PERSONAL PROTECTION EQUIPMENT

It is the policy of Conewago to wear a hard hat, safety glasses, Hi-Vis outerwear, and steel toe work boots on the jobsite. Because of the hazards involved with excavations, other personal protective equipment may be necessary, depending on the potential hazards present (examples - goggles, gloves and respiratory equipment).

INSPECTIONS

Daily inspection of excavations, the adjacent areas and protective systems shall be made by the competent person for evidence of a situation that could result in a cave-in, indications of failure of protective systems, hazardous atmospheres or other hazardous conditions.

All inspections shall be conducted by the competent person prior to the start of work and as needed throughout the shift.

Inspections will be made after every rainstorm or any other increasing hazard.

All documented inspections will be kept on file in the jobsite safety files and forwarded to the Safety Director weekly.

TRAINING

The competent person(s) must be trained in accordance with the OSHA Excavation Standard, and all other programs that may apply (examples - Hazard Communication, Confined Space and Respiratory Protection), and must demonstrate a thorough understanding and knowledge of the programs and the hazards associated.

All other employees working in and around the excavation must be trained in the recognition of hazards associated with trenching and excavating.

Fall Protection

I. Purpose

The purpose of this program is to establish minimum requirements and responsibilities for employees when on walking-working surfaces, including elevated work platforms, and rooftops for fall protection. These systems and procedures are intended to prevent employees from falling off, onto or through working levels and to protect employees from falling objects. This program applies to all employees who might be exposed to fall hazards, except when inspecting, investigating, or assessing workplace conditions before and after construction work.

Preparation:

All fall protection systems selected shall be installed before an employee is allowed to go to work in an area that necessitates the protection.

Prior to beginning work, the site superintendent or his designated representative shall:

- Inspect the area to determine what hazards exist or may arise during work.
- Identify the hazards and select the appropriate measures and equipment. Give specific and appropriate instructions to workers to prevent exposure to unsafe conditions.
- Ensure employees follow instructions and follow procedure.
- Monitor subcontractors to ensure they meet their fall protection requirements.

Prior to beginning work, employees shall:

- Inspect (daily) and maintain their personal fall protection systems in working condition.
- Report and replace any defective components at the time of inspection.
- Report potential hazards to their supervisor and take measures to ensure the safety of anyone in the vicinity of a hazard.
- All employees shall follow all policy and procedure as it pertains to this program, use safe work practices and use fall protection equipment properly.

II. Fall Protection Systems

Under Subpart M, when an employee is exposed to a fall hazard of 6 feet or more to a lower level, he/she must be protected by a guardrail system, safety net system, or personal fall arrest system. OSHA Subpart M applies to all construction workplaces, except when another subpart of Part 1926 specifies what fall protection systems must be used. Other subparts may set the criteria for those fall protection systems.

Guardrail Systems

- Top rails and midrails of guardrail systems must meet OSHA standards. The guardrail system must be capable of withstanding a force of at least 200 pounds in an outward or downward direction. The top edge of the guardrail must not deflect to a height less than 39 inches in a downward direction.
- Minimum $^1/_4$ inch wire rope may be used provided it meets all other criteria in this standard, and is flagged at no more than 6 foot intervals with high visibility material.
- The top edge height of guardrails must be 42 inches plus or minus 3 inches above the walking/working level. The top rails and mid rails must not overhang terminal posts, creating a projection hazard.
- Guardrail systems shall be surfaced to protect workers from punctures or lacerations and to prevent clothing from snagging.
- At holes, guardrail systems must be set up on all unprotected sides or edges.
- Where guardrails are used to protect ladderways to other levels, the point of access must be offset.
- Chains, gates or removable guardrails are used at hoisting or entry areas.

Protection from falling objects

Toeboards: When toeboards are used as protection from falling objects, they must be erected along the edges of the walking/working surface for a distance sufficient to protect persons working below. Toeboards shall be capable of withstanding a force of at least 50 pounds applied in any downward or outward direction. Toeboards shall be a minimum of 3.5 inches tall and be solid or have no openings larger than 1 inch.

Hardhats: Hardhats are required.

Personal Fall Arrest Systems

Personal Fall Arrest Systems consist of an anchor point, connector, and a body harness. All fall protection systems shall comply with the applicable provisions of 29 CFR 1926 Subpart M.

- Limit maximum arresting force on an employee to 1800 pounds when used with a body harness.
- Be rigged so that an employee can neither free fall more than 6 feet nor contact any lower level.
- Bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet.
- Have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet or the free fall distance permitted by the system, whichever is less.
- Any lifeline, safety harness, retractable, or lanyard subjected to in-service loading, as distinguished from Static load testing shall be immediately removed from service and not used again.

Safety Net Systems

- Safety nets shall comply with 29 CFR 1926.502©

Additional Fall Protection Systems

Controlled Access Zones

A controlled access zone is a work area designated and clearly marked in which certain types of work may take place without the use of conventional fall protection systems. Controlled access zones are used to restrict access to work areas where conventional fall protection systems are not in use.

Controlled access zones, when created to limit entrance to areas where leading edge work and other operations are taking place, must be defined by a control line or by other means that restrict access.

Warning Line Systems – per 29 CFR 1926.502

Warning lines shall be erected around all sides of roof work areas. The warning line must be erected not less than 6 feet from the roof edge. When mechanical equipment is being used, the warning line shall be erected not less than 6 feet from the roof edge parallel to the direction of the mechanical equipment operation, and not less than 10 feet from the edge perpendicular to the direction of mechanical equipment operation.

- Warning line systems consist of ropes, wires, or chains and supporting stanchions and are set up as follows:
- Warning lines must be flagged or otherwise clearly marked at not more than 6 feet intervals with high visibility material.
- Warning lines must be rigged and supported in such a way that the lowest point ***(including sag)*** is not less than 34 inches from the walking/working surface and the highest point is not more than 39 inches from the walking/working surface.
- Stanchions, after being rigged with warning lines, shall be capable of resisting, without tipping over, a force of at least 16 pounds.
- The rope, wire, or chain must have a minimum tensile strength of 500 pounds as attached to the stanchions.
- The rope, wire, or chain shall be attached to each stanchion in such a way that pulling on one section of the line between stanchions will not result in slack being taken up in the adjacent section before the stanchion tips over.

Safety Monitoring Systems

It is the policy of Conewago that safety monitoring systems shall not be utilized on any company owned property or company controlled construction sites, as they do not afford enough protection for workers exposed to fall hazards.

Holes

Personal fall arrest systems, covers, or guardrail systems shall be erected around holes (including skylights) that are more than 6 feet above lower levels.

Fall Protection for Roofs

Each employee engaged in roofing activities with unprotected sides and edges 6 feet or more above lower levels shall be protected from falling by guardrail systems, safety nets or personal fall arrest systems. Exception: On low-slope (less than or equal to 4/12 pitch) roofs 50 feet or less in width the use of a safety monitoring system without a warning line is permitted.

Formwork and Reinforcing Steel Fall Protection

At heights less than 24 feet, fall protection is not required for employees moving (point to point) vertically or horizontally on the vertical face of rebar assemblies built in place. OSHA considers the multiple handholds and footholds on rebar assemblies as providing similar protection as that provided by a fixed ladder.

Positioning-device systems are the most appropriate type of personal fall protection for working on rebar. The difference between a positioning device system and a personal fall arrest system is that a positioning system supports a worker on an elevated surface and limits a fall to two feet. A personal fall arrest system limits free fall to no more than six feet.

When working on standard forms more than 6 feet above a lower level you must use appropriate fall protection (personal fall arrest or positioning device system).

Do not walk, sit or stand on top of wall forms.

Precast Concrete Erection Fall Protection

Every employee who is 6 feet or more above lower levels while erecting precast concrete members and related operations such as grouting or precast concrete members, shall be protected by a guard rail system, safety net, or personal fall arrest system.

> **NOTE:** Where it is infeasible or creates a greater hazard to use these systems, a written fall protection plan must be developed and implemented that meets the requirements of 29 CFR 1926.502(k).

Steel Erection Fall Protection

Conewago employees engaged in steel erection activities 6 feet or more above a lower level shall be protected from fall hazards by guardrail systems, safety nets, or a personal fall arrest (or restraint) system.

OSHA describes a controlled decking zone as an area over 15 feet and up to 30 feet above a lower level in which the placement of metal decking may take place without the use of conventional fall protection systems, where access to the zone is controlled. ***Controlled Decking Zones are not authorized without permission from the Safety Director. It is standard Conewago practice to utilize conventional fall protection during this activity.***

Custody of Fall Protection Systems.

Fall protection systems provided and erected by and for Conewago employees must be inspected and maintained to OSHA standards on a daily basis. Upon completion of work activities by Conewago, these systems are to be dismantled. Other trades are responsible for supplying, inspecting, and maintaining their respective fall protection systems. Conewago site superintendents shall stop work whenever systems are not in place or not utilized according to regulation and policy.

Walking/Working surfaces

All walking/working surfaces shall be kept clean, dry (where possible), and orderly. Every floor, workplace, and passageways shall be kept free from protruding nails, splinters, holes, or loose boards. Walking/working surfaces must have the strength and integrity to support employees. Covers and or guardrails shall be provided to protect personnel from the hazards of open pits, tanks, vats, ditches, etc.

III. Fall Protection Plans

The basic purpose of a written fall protection plan is to clarify, in writing, less conventional fall protection measures, especially during leading edge work and precast concrete or steel erection. Written fall protection procedures establish job-specific guidelines to be followed whenever an employee works above dangerous equipment or at heights greater than 6 feet. Written fall protection plans shall be read and discussed with all personnel affected (including ground support). All affected personnel shall sign the plan. The signed copy of the plan shall be maintained onsite.

Conventional fall protection systems do not require a written plan when adhering to regulation and policy and supported by training. However, it is good practice to prepare a fall protection plan to document procedures that ensure all work requiring fall protection is carried out safely. The effectiveness of a written fall protection plan depends on the active support and involvement of all employees who perform jobs requiring it. ***If you would like assistance in preparing a fall protection plan, contact the Conewago Safety Department.***

IV. Emergencies

In the event of a fall from the lift the employee involved in the fall shall release the suspension trauma straps on the sides of their harness and step into them if able to do so. The employee should yell for help, if able, and any lifts in the immediate area should move to employee involved in the fall for rescue. At this time all lift operations stop until the employee has been rescued and returned to ground level. First responders will take

over from there and “event” procedures will be put in place to address any injuries and complete necessary reports.

Although fall protection systems are designed to minimize exposure to fall hazards and reduce the risk of injury, it is important to plan for emergencies in order to ensure that workers who do fall receive prompt emergency and medical attention. Emergency response procedures should include:

Post emergency responder phone numbers.
Mark the worksite with signs and note the address and easiest access routes in and out of the site.
Post employees along the route to direct EMS on the site.
Identify onsite equipment that can be used for rescue and retrieval (Example: lifts and ladders).
Identify primary first aid providers for quick response.
Contact the Conewago Safety Director as soon as the emergency has been addressed.

V. Training Requirements

Each employee who might be exposed to fall hazards shall be provided training to ensure that fall potentials are recognized and that each employee knows the procedures to be followed to minimize these hazards.

A competent person will conduct the training, which includes the following:

The nature of fall hazards in the work area.
The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection system to be used.
The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used.
The limitations of the use of mechanical equipment during the performance of roofing work on low-sloped roofs.
The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection.
The role of employees in fall protection plans.
The standards contained in Subpart M of 29 CFR 1926.

The training will be certified in writing and will contain the names of the employees trained, the date of the training, and the signature of the person who conducted the training.

NOTE: All Conewago employees shall be provided this training. Contact the Safety Director if you or anyone you work with has not had this training.

Retraining Requirements:

Employees will be retrained when it is determined that the necessary skills and understanding are not acceptable. Circumstances where retraining is required include:

- Changes in the workplace that render the previous training obsolete.

- Changes in the types of fall protection systems or equipment to be used render the previous changes obsolete.
- Inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicate that the employee has not retained the requisite understanding or skill.

VI. Enforcement:

Constant awareness of and respect for fall hazards, and compliance with all safety rules are considered conditions of employment. The site superintendent and safety director reserve the right to issue warnings and safety violations, up to and including termination, for failure to follow the guidelines of this program.

Fire Prevention and Housekeeping Plan

I. **Purpose:** To describe those procedures necessary to minimize our threat of fire and the subsequent injury and losses that could result.

II. **Reference:** Occupational Safety and Health Standards for General Industry, Title 29 CFR 1910.38(b).

III. **Scope:** This plan applies to all employees to take active measures to minimize the threat of fire in our workplaces. It especially applies to those employees who use flammable substances and /or heat producing equipment. This requires careful usage and storage of flammable substances and the use of good housekeeping practices by all employees.

IV. **V. Responsibilities:**

A. The Production Manager has overall responsibility for this plan.

B. The Plant Manager in collaboration with the Safety Manager is responsible for:

1. Ensuring, in collaboration with maintenance personnel, that all potential fire hazards are identified, and that sufficient storage and handling procedures are implemented to reduce the potential for fire.

2. Ensuring, in collaboration with maintenance personnel, that all potential sources for fire ignition are identified and that adequate controls are implemented.

3. Maintaining a current list of major fire hazards in the workplace.

4. Developing adequate production housekeeping procedures to reduce the accumulation of combustible waste and residue and the subsequent threat of fire or injury.

5. Maintaining an inspection process to ensure that all fire extinguishers are inspected monthly.

6. Assisting the warehouse in yearly maintenance checks of all fire extinguishers in the plant.

7. For training all production workers in these procedures.

C. Maintenance is responsible for:

1. Ensuring, in collaboration with the Safety and Production/Plant Managers, that all potential fire hazards are identified, and that sufficient storage and handling procedures are implemented to reduce the potential for fire.

2. Ensuring, in collaboration with the Safety and Production/Plant Managers, that all potential sources for fire ignition are identified and that adequate controls are implemented.

3. Maintaining a current list of major fire hazards in the workplace.

4. Developing adequate maintenance housekeeping procedures to reduce the accumulation of combustible waste and residue and the subsequent threat of fire or injury.

5. Establishing adequate maintenance procedures for the equipment and systems installed on heat producing equipment and flammable spray equipment to prevent accidental ignition of the equipment or combustible materials.

6. Establishing controls for heat or spark producing maintenance work to minimize the threat of fire from such work.

7. For training of all maintenance personnel regarding these procedures.

D. The Safety and Production Managers are responsible for:

1. Training employees on the fire prevention and housekeeping procedures established for their department (s).

2. Enforcing workplace rules established by these procedures.

3. Providing necessary tools or equipment for proper storage and use of flammable substances.

4. Providing necessary tools and equipment for housekeeping duties.

5. Provide for routine cleanup duties or chores.

E. Production and maintenance employees are responsible for:

1. The proper storage and handling of flammable substances.

2. Routine housekeeping chores to minimize the threat of fire or injury.

3. Adherence to departmental fire prevention and housekeeping procedures.

F. Contract workers: Management shall ensure that all contract workers are familiar with the major workplace fire hazards and plant control procedures prior to beginning work in the facility.

V. Procedures:

A. General Procedures: Fire Prevention

1. When not in use, non-bulk packaged flammables will be stored in approved flammable storage cabinets.

2. Bulk packaged flammables will be stored in the approved flammable storage area.

3. Only quantities of flammable substance necessary for the task or shift may be temporarily stored or used at the work site.

4. Caps or lids will be replaced immediately after use on all chemical containers.

5. Bulk containers used to pump, transfer, or otherwise draw flammable substances from, will use enclosed fittings to minimize escaping vapors.

6. An ABC portable fire extinguisher will be immediately available at all locations where flammable substances are being used, stored, or transferred.

7. Trash receptacles will not be placed within 10 feet of any heat producing equipment.

8. Non-bulk flammable substance containers and other flammable substances (e.g., oily rags) will be discarded only in designated self-closing metal trashcans.

9. Smoking is not authorized in the plant. Authorized smoking areas have been designated outside the work areas.

10. All "hot work" (welding, brazing, grinding, etc.,) will be done in an approved area remote from other activities. When hot work must be completed outside this designated area, a hot work permit will be issued by maintenance personnel.

B. General Procedures: Housekeeping

1. All trash and waste or scrap materials must be cleaned /swept up and put into proper waste receptacles daily at the end of the work shift.

2. All waste receptacles must be emptied into appropriate “hoppers” and scheduled to be picked up by a waste management service regularly.

3. Recycling receptacles must be available whenever possible where service is provided and properly labeled for those items.

VI. Training:

A. Employees will be trained in these procedures during new hire orientation, upon job reassignment, and whenever necessary to ensure compliance with these procedures.

B. Supervisors are responsible for specific training of these procedures for each employee upon job assignment or re-assignment.

C. First responders are trained in the proper use of fire extinguishers yearly.

VII. Disciplinary Process:

A. Disciplinary action: Supervisors are required to document violations of this safety policy. Violations of this safety policy will be addressed through the Conewago disciplinary process**.**

First Aid Program

Conewago is dedicated to the protection of its employees from on-the-job injuries and illnesses. However, when injuries or illnesses do occur, we are prepared to immediately respond to the needs of the injured or ill.

This written First Aid Program is intended to ensure that Conewago meets the requirements of 29 CFR 1910.151, Medical Services and First Aid.

Administrative Duties

The Safety Manager is our First Aid Program Administrator and is responsible for establishing and implementing the written First Aid Program. This person has full authority to make necessary decisions to ensure the success of this program. Copies of this written program may be obtained from the Safety Manager in their office. If after reading this program, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to the success of this written program.

First Aid Personnel

First aid personnel are readily available for advice and consultation on matters of employee health.

The *National EMS Education and Practice Blueprint* lists the following first aid designations:

- **First aid provider**: Occupationally required to be trained in first aid even though they may not be specifically obligated by law to perform first aid. Responds as a "Good Samaritan." Uses a limited amount of equipment to perform initial assessment and provide immediate life support and care while awaiting arrival of emergency medical services (EMS).
- **First responder**: Uses a limited amount of equipment to perform initial assessment and intervention and is trained to assist other EMS.
- **Emergency Medical Technician (EMT)-Basic**: The 2nd level of professional emergency medical care provider. Qualified to function as the minimum staff for an ambulance.
- **EMT-Intermediate**: The 3rd level of professional emergency medical care provider. Can perform essential advanced techniques and administer a limited number of medications.
- **Paramedic**: The 4th level of professional emergency medical care provider. Can administer additional interventions and medications.

The nearest hospital, clinic, or infirmary is Hanover Hospital.

Risk Management Department handles WC Coordination.

First Aid Supplies and Equipment

It is important that our first aid supplies and equipment meet the specific needs of our employees.

Cintas has ensured that adequate first aid supplies are readily available, including: all necessary items through monthly inspection of first aid kits in manufacturing plants. The warehouse stocks items for Foremen to replace in their first aid kits as needed post monthly inspection.

Because we have injurious corrosive materials, Conewago provides these drenching and flushing facilities that meet the specifications of ANSI Z358.1,

Emergency Eyewash and Shower Equipment:

Eye Wash, and shower	At main restrooms beside breakroom		
Eye wash	All exterior walls, mezzanine by mixers in precast. In portable concrete plant on jobsites and wherever concrete is being poured on site.		

Because it is reasonably anticipated that employees will be exposed to blood or other potentially infectious materials while rendering first aid, we provide the following personal protective equipment: gloves masks and aprons. See our written Exposure Control Program for further details.

Training

Training is the heart of our First Aid Program. Employees should NOT attempt to rescue or treat an injured or ill employee unless they are qualified to do so. Instead, they should contact someone who is qualified.

Employees who are qualified to render first aid have completed Conewago's first aid training program.

First aid training is done annually. We include classroom and hands-on training. Our training ensures that trainees are knowledgeable in First aid and CPR, and AED use.

Follow National Safety Council training.

Training Certification

After an employee has completed our First Responder training program, the trainer will determine whether the employee can safely perform first aid. The trainer and Safety Manager are responsible for keeping records verifying certification of each employee who has successfully completed training. Each certificate is a valid certificate in first-aid training, and includes the name of the employee, the date(s) of the training, and the signature of the person who performed the training and evaluation.

Retraining

Trained employees are retrained annually in Fire Extinguisher use and bi-annually in First Aid/CPR/AED use to keep their knowledge and skills current.

Accident Reporting

We require our employees to report all injuries or illnesses to their supervisor or department lead person. This allows us to address their medical needs in the appropriate manner. This includes those injuries and illnesses involving first aid, professional treatment, time away from work, or a near miss of a more serious accident. Even injuries that do not become apparent until after the cause must be reported. For example, back pain that develops over a period of time must be reported.

Record Keeping

The Safety Manager is responsible for maintaining all OSHA records and documentation relating to first aid, injuries, illnesses, and accidents.

Program Evaluation

By having the safety team review, evaluate and, as necessary, revise our program, we ensure our program's effectiveness and prevent or eliminate any problems. Program evaluation is performed annually and involves the safety team

Forklift Safety
Powered Industrial Truck Program

Purpose

A. This Forklift Operation Program establishes guidelines to be followed whenever any "Conewago" employees work with powered industrial trucks.

B. The procedures establish uniform requirements designed to ensure that powered industrial truck safety training, operation, and maintenance practices are communicated to and understood by all "Conewago" employees. In addition, these requirements are designed to ensure procedures are in place to safeguard the health and safety of all employees.

Administrative Duties

A. The Safety Director, is the company's Forklift Operation Program Coordinator. Copies of this program may be obtained from the Safety Department.

Training

A. "Conewago" shall ensure that each powered industrial truck operator is competent to operate the equipment safely. This will be achieved through training and evaluation.

B. Prior to permitting an employee to operate a powered industrial truck (except for training purposes), each operator shall successfully complete training as required in 29CFR 1926.600 (1910.178).

C. Conewago forklift operators are evaluated on the following types of forklifts:
Electric motor, sit down, counter balanced (solid and pneumatic tires).
Internal combustion (diesel, gasoline and LP) engine trucks (solid and pneumatic tires).
Rough Terrain.

D. Initial training shall consist of classroom instruction and practical training. Classroom training shall be conducted by the Safety Director or a designated representative. Practical training shall be conducted by a certified and experienced operator designated by the Safety Director. Evaluations will be performed by the safety department after the trainee has completed 24 working hours of hands on training under the supervision of a competent person. Trainees may operate a powered industrial truck under the direct supervision of a certified and experienced person while performing routine tasks.

F. An employee who has completed the classroom portion of the training need not be retrained in those elements before demonstrating his/her practical abilities for each type of powered industrial truck that employee will be authorized to operate.

Refresher Training and Evaluation

A. Refresher training may be required when:

1. An operator has been observed operating in an unsafe manner.

2. An operator has been involved in an incident with injury, a property damage incident or a near-miss incident.

3. The operator has received an unfavorable evaluation.

4. The operator is assigned to drive a different type truck.

5. A condition in the workplace changes in a manner that could offset the safe operation of the truck.

Evaluations

A. An evaluation of each powered industrial truck operator's performance shall be conducted upon completion of 24 working hours of practical skills and at least every three years.

B. The certification records will be maintained by the Safety Department and shall include the name of the operator, the date of training, the date of evaluation, and the identity of persons performing the training and/or evaluation.

Inspections

A. Pre-use Inspection

1. A pre-use inspection identifies potential hazards that may be encountered from a damaged forklift and should be performed at least daily. If at any time a forklift is found to be in need of repair, defective, or in any way unsafe, remove it from service until it has been restored to safe operating condition.

2. The pre-use inspection process is as follows:
   Inspect the mast for broken or cracked weld points and any other obvious damage.
   Ensure roller tracks are greased and that chains are free to travel.
   Forks should be equally spaced and free from cracks along the bald and at the heels.
   Horns and alarm system.
   Up-to-date fire extinguisher.
   Check hydraulic fluid levels.
   Check each hydraulic line and fitting for excessive wear or crimping.
   Check lift and tilt cylinders for damage or leaking fluid.
   Inspect mounting hardware on the cylinders
   Check tires for excessive wear, splitting or missing tire material.
   Check pneumatic tires for proper pressure indicated on the tire.
   Check fuel level and look for leaks.
   Check brakes and steering.
   Headlights, taillights and warning lights.

B. Power Source Inspection

1. Battery Power

Batteries contain acid so protective gloves, goggles, and long sleeves must be worn when working with batteries.

Batteries should be inspected for:

- Cracks or holes
- Securely sealed cells
- Frayed cables
- Broken insulation
- Tight connections
- Clogged vent caps

2. Propane Power

The propane tank should be inspected for cracks, broken weld points, and other damage.

All valves, nozzles, and hoses should be secure and do not leak.

If damage is found, the equipment should not be operated until the damage has been corrected.

Fuel Handling and Storage

A. Store and handle liquid fuels such as gasoline and diesel in accordance with NFPA Flammable and Combustible Liquids Code (NFPA No. 30-1969).

B. Store and handle liquefied petroleum gas in accordance with NFPA Storage and Handling of Liquefied Petroleum Gases (NFPA No. 58-1969).

C. Turn off engine before filling fuel tanks.

Battery Handling and Storage

A. Designated Areas

1. Locate battery charging installations in designated areas that provide flushing and neutralizing of spilled electrolyte, fire protection, protection of charging apparatus, damage by trucks, and adequate ventilation for dispersal of battery gassing fumes.

2. Battery handling equipment and a carboy tilter or siphon for handling electrolyte should be provided.

3. Smoking is prohibited in the designated area.

B. Charging Batteries

1. When charging batteries, pour acid into water; not water into acid.

2. Properly position forklift and apply brake before attempting to change or charge batteries.

3. Properly position and secure reinstalled batteries in the forklift.

4. Ensure vent caps are functioning and the battery (or compartment) cover(s) are open to dissipate heat.

5. Prevent open flames, sparks, or electric arcs in battery charging areas.

6. Keep tools and other metallic objects away from the top of uncovered batteries.

General Forklift Safety

A. The most common forklift accidents are caused:

1. When a person is struck by the forklift

2. Stock is shoved into or falls upon another person or falls upon the forklift operator

3. The operator is injured when getting on or off the forklift

4. When the forklift collides with another forklift or other vehicle

5. When the forklift falls off the dock or tips over

6. When the operator is struck by passing objects or

7. The forklift tips over because the rated capacity is exceeded or the load is handled improperly

B. When mounting or dismounting a forklift, always:

1. Face the vehicle

2. Never jump off

3. Use a three-point stance (always have both hands and one foot or vice-versa in contact with the unit)

4. Wear proper shoes (oil resistant and non-slippery)

5. Wear proper clothing (do not wear loose clothing or dangling jewelry), and

6. Restrain long hair

C. After mounting the vehicle, always fasten the seat belt, apply the brake, and shift to neutral. Also, check around the forklift for clearance and pedestrians before moving.

Forklift Operating Guidelines

A. Only trained and authorized personnel are permitted to operate a forklift.

B. Do not stand or pass under the elevated portion of any forklift.

C. Passengers are prohibited from riding on forklifts.

D. Do not place arms or legs between the uprights of the mast or outside the running lines of the truck.

E. A forklift is considered unattended when the operator is 25 feet or more away from the vehicle and it remains in his view, or whenever the operator leaves the vehicle and it is not in his view. When a forklift is left unattended:

1. Fully lower load engaging means

2. Neutralize controls

3. Shut off power

4. Set brakes

F. When the forklift operator is dismounted, within 25 feet and in view of the forklift, then fully lower the engaging means, neutralize the controls, and set the brakes to prevent movement.

G. Maintain a safe distance from the edge of ramps or platforms while on any elevated dock or platform.

H. Forklifts are not to be used to open or close freight doors.

I. OSHA standards dictate that at any time general lighting is less than two lumens per square foot auxiliary directional lighting on the truck must be provided.

J. Fixed jacks may be necessary to support a semi-trailer and prevent upending during the loading and unloading when the trailer is not coupled to a tractor.

K. Set brakes and block wheels to prevent movement of trucks and trailers while loading or unloading.

L. Check the flooring of trucks and trailers for breaks and weakness before loading or unloading.

M. Check for sufficient headroom under overhead hazards such as lights, pipes, or sprinkler systems.

N. Use only approved forklifts in hazardous locations.

Handling and Moving Loads

A. To Pick up a Load

1. Only pick up stable and safely arranged loads within the rated capacity of the forklift.

2. Adjust long or high (including multiple tiered) loads, which may affect capacity.

3. Square up on the center of the load and approach it straight with forks in traveling position.

4. Stop when the tips of the forks are about a foot away from the load.

5. Level the forks and slowly drive forward until the load is resting against the backrest.

6. Lift the load high enough to clear whatever is under it.

7. Carefully tilt the mast back to stabilize the load.

8. Only operators trained in Rigging and Signaling can attach and use rigging (ie:straps, wire rope, slings, etc.) with forklifts. All others must stop and contact the site Superintendent for assistance with this task.

B. Driving with a Load

1. Starts and stops should be gradual.

2. Observe all traffic regulations and keep forklift under control at all times.

3. Reduce speed and sound horn at cross aisles and other locations where vision is obstructed.

4. Pedestrians have the right-of-way. Always be aware of their presence, especially in aisles and doorways.

5. Do not drive forklift up to anyone standing in front of a bench or other fixed object.

6. Keep a clear view of the path of travel. Always look in the direction of travel.

7. Always travel with a load tilted slightly back for added stability. Do not lift or lower the load when the forklift is in motion.

8. Travel with the load at a height of four to six inches at the tips and two inches at the heels to clear most uneven surfaces and avoid debris.

9. Horseplay is not permitted.

10. Slow down for wet, slippery, or uneven floors.

11. Avoid running over loose objects on the roadway surface.

12. Properly secure dock boards and bridge plates before driving over them. Drive over slowly and never exceed their rated capacity.

13. Drive in reverse rather than looking around the load if you are unable to see over it.

14. Travel down inclines in reverse and up inclines going forward. Ascend and descend grades slowly. If the grade is in excess of 10 percent, drive with load upgrade.

C. Safe Steering

1. Never make a turn at normal traveling speed, always slow down to maintain balance.

2. Stay wide when turning into an aisle to help clear the sides and square up with the destination.

3. Allow enough room for forks to clear the sides before turning, when backing out of an aisle.

4. When negotiating turns, turn the steering wheel in a smooth sweeping motion. At very low speeds, turn the steering wheel at a moderate, even rate.

D. To put a Load Down

1. Square up and stop about a foot away.

2. Level the forks and then drive the rest of the way in.

3. Lower the load.

4. Tilt the forks slightly forward to avoid hooking the load.

5. Look over both shoulders and back straight out until the forks clear the pallet.

Hazard Communication

Company Policy: Conewago will comply with the requirements of OSHA's Hazard Communication Standard by compiling a list of hazardous chemicals, using SDSs, ensuring containers are labeled, and training our workers. In addition, all SDS information is available, and will be shared with subcontractors and anyone else exposed to the hazards on our worksites. This policy applies to all work operations in our companies where employees may be exposed to hazardous substances under normal working conditions or during an emergency situation. We strive for clear understanding, safe behavior, and involvement in the program from every employee.

The Safety Director, is the Hazcom Program Coordinator. They will review and update the program as necessary. Conewago utilizes cloud-based services for storage of and access to all SDS for hazardous substances in use by the company. This system is made available to all employees through the use of company issued electronic equipment. Local and physical copies of all SDS will be downloaded periodically and maintained by the Safety Department, in order to meet the requirements of CFR 1910.,1200(g)(8) and (g)(9). All employees can request information on this written program at any time by contacting the Safety Director. The Hazard Communication Program exists to inform our employees of the contents of the Hazard Communication Standard, the hazardous properties of chemicals with which they work, safe handling procedures and measures to take to protect themselves from those chemicals.

Hazard Evaluation Procedures:

Our SDS inventory is a list of hazardous chemicals known to be present in the workplace. Anyone who comes into contact with these chemicals needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified whether they are found in a container or generated in work operations (for example, welding fumes, silica dust and exhaust fumes). Hazardous chemicals can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists.

Safety Data Sheets (SDSs)

The SDSs we use are fact sheets for the chemicals that pose a physical or health hazard in the workplace. SDSs provide employees with specific information on the chemicals they use. Every employee should be aware of the nearest access to SDSs at all times.

The responsibility for obtaining SDS is that of the employee making the purchase and/or receiving the material. He/she will contact the chemical manufacturer or vendor if additional research is necessary. If the SDS is not received at the time of the first shipment, the purchaser shall contact the vendor per our Hazard Communication Policy AS SOON AS POSSIBLE and have the information forwarded by fax or email followed by a record copy (through the mail or hand-carried).

It is the responsibility of the on-site employee accepting new shipments to check the onsite SDS binder/list for the applicable SDS. If no SDS arrived with

the material, and if there is no SDS for the material in the SDS binder/list, the employee shall contact the purchasing agent assigned to the project to obtain the necessary SDS. If the purchasing agent is not available, the on-site employee shall contact the stockroom or safety department in pursuit of the needed information.

It is the responsibility of the on-site supervisor to insure the SDSs are available on his jobsite. All job-specific hazardous materials will be accounted for with an SDS. The site superintendent may choose to maintain a separate job file of hazardous materials **ALONG WITH the SDS binder/list**. Both articles must be maintained at the same location and available at all times to anyone who is working on the site.

Labels and other forms of warning:

Manufacturers' labels list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other responsible party. The chemical identity used by the supplier may be a common or trade name, or a chemical name. The hazard warning is a brief statement of the hazardous effects of the chemical (i.e., "flammable," or "causes lung damage"). In addition, labels frequently contain other information, such as precautionary measures (i.e., "do not use near open flame").

The site superintendent, job foreman, shop foreman, or crew leader (person in charge) is responsible for all hazardous materials stored in in-house containers. All such materials must be properly labeled. Any hazardous materials that are shipped in larger shipping containers must be identified as required by Federal/State/Local Motor Carrier Regulations.

Training:

The Safety Director is responsible for the company employee training program. They will ensure that all program elements specified below are carried out:

Prior to starting work, each new employee will attend a health and safety orientation that includes the following information and training:

An overview of the requirements contained in the Hazard Communication Standard.
Hazardous chemicals present at the workplace.
Physical and health risks of the hazardous chemicals.
The symptoms of overexposure.
How to determine the presence or release of hazardous chemicals in the work area.
How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices, and personal protective equipment.
Steps the company has taken to reduce or prevent exposure to hazardous chemicals.
Procedures to follow if employees are overexposed to hazardous chemicals.
How to read labels and review SDSs to obtain hazardous information.
Location of the SDSs file and written Hazcom program.

Prior to introducing a new chemical hazard into any company division, each employee in that division will be given information and training as outlined above for the new chemical hazard.

Hazards of non-routine tasks:

Periodically, employees are required to perform hazardous non-routine tasks. Some examples of non-routine tasks include: confined space entry and tank cleaning. Prior to starting work on such projects, each affected employee will be provided information by the Safety Director or Job Superintendent about the hazardous chemical he/she may encounter during such activity. This information will include specific chemical hazards, protective and safety measures the employee can use, and steps the company has taken to reduce the hazards, including ventilation, respirators, presence of another employee and emergency procedures.

Informing other employers and workers:

When other contractors, subcontractors, or any other employer's workers (i.e., painters, plumbers, electricians, etc.) will be working at a "Conewago" work site, the Project Superintendent and/or Safety Director will:

Provide the other employer(s) with the MSDS/SDS for any of our chemicals to which their employees are exposed as part of our Hazard Communication Policy.
Relay necessary label and/or emergency precautionary information to the other employer(s) onsite.

Each contractor, subcontractor, or any other person bringing chemicals onsite must provide "Conewago" personnel with the appropriate hazard information on these substances, including MSDSs/SDSs, the labels used, and the precautionary measures to be taken in working with these chemicals.

Chemicals in Unlabeled Pipes:

Work activities are sometimes performed by employees in areas where chemicals are transferred through unlabeled pipes. Prior to starting work in these areas, the employee shall contact the Project Manager, Superintendent, or Safety Director to obtain information regarding:

The chemical in the pipes.
Potential hazards.
Safety precautions, which should be taken.

A copy of this program will be made available to employees and their representatives upon request.

All subcontractors, vendors, and suppliers will have available and onsite all SDS pertaining to hazardous materials they bring onsite. That information is to be provided to ***ANYONE*** onsite upon their request ***WITHOUT DELAY.*** The main repository of all onsite SDS information shall be the Conewago Site Superintendent's office trailer, company issued electronic device, or any other location the Conewago Site Superintendent designates.

CONTROL OF HAZARDOUS ENERGY
LOCKOUT/TAGOUT

Policy

All employees will be protected from injuries caused by the unexpected energizing or start-up of machines or equipment, or release of stored energy during service, repair, maintenance, operation, and associated activities. This policy establishes minimum performance requirements for the control of such potentially hazardous conditions. This will be accomplished by locking out and tagging out energy isolating devices, and otherwise disabling machines or equipment to prevent unexpected energizing, start-up or release of stored energy.

Normal production operations are not covered by this policy. Repairing and/or maintaining equipment during normal production operations are covered by this policy, only if:

An employee is required to remove or bypass a guard or other safety device; or
An employee is required to place any part of his or her body into an area on a machine or piece of equipment where work is actually performed upon the material being processed (point of operation) or where an associated danger zone exists during a machine operating cycle.

This policy does not apply to work on cord and plug connected electric equipment for which exposure to the hazards of unexpected energizing of start-up of the equipment is controlled by the unplugging of the equipment from the energy source and by the plug being under the exclusive control of the employee performing the maintenance or repair.

I. Definitions

Affected Employee: An employee whose job requires him/her to operate or use a machine or equipment on which maintenance or repair is being performed under this lockout/tagout policy, or whose job requires him/her to work in an area in which maintenance or repair is performed.

Authorized Individual: A knowledgeable individual to whom the supervisor has given the authority and responsibility to lock or implement a lockout/tagout procedure on machines or equipment to perform maintenance or repair. An authorized individual and an affected individual may be the same person when the affected employee's duties also include performing maintenance or repair of a machine or equipment that must be locked or tagged out.

Knowledgeable Individual: An individual who is qualified to operate the controls or equipment and is familiar with the effects of the operation.

"Capable of being locked out": An energy isolating device will be considered capable of being locked out if it has any of the following:

i. It is designed with a hasp or other attachment or integral part to which, or through which, a lock can be affixed,
ii. It has a locking mechanism built into it, or

iii. If a lockout can be achieved without the need to dismantle, rebuild or replace the energy-isolating device or permanently alter its energy control capability.

Energy Isolating Device: A mechanical device that physically prevents the transmission or release of energy, including, but not limited to, the following: a manually operated electrical circuit breaker, a disconnect switch, a manually operated switch, a slide gate, a slip blind, spectacle flange, a line valve, blocks, and similar devices with a visible indication of the position of the device. *Push buttons, selector switches, and other control circuit type devices are not energy isolating devices.*

Energy Source: Any electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy source that could cause injury to personnel.

Lockout Device: A device that utilizes a lock and key to hold an energy isolating device in the safe position and prevents a machine or equipment from being energized.

Lockout/Tagout: The placement of a lock and tag on the energy isolating device in accordance with an established procedure, indicating that the energy isolating device shall not be operated until removal of the lock/tag in accordance with an established procedure. *The term* "lockout/tagout" requires the combination of a lockout device and a *tagout device.*

Maintenance and Repair: Workplace activities such as constructing, installing, adjusting, inspecting, modifying and maintaining machines or equipment. These activities include, but are not limited to lubrication, cleaning or unjamming of machines or equipment and making adjustments or tool changes, where the employee may be exposed to the unexpected start-up of the equipment or release of hazardous energy.

Shall: The word "shall" always implies a mandatory requirement.

Tagout Device: A prominent warning device, such as a tag, that can be securely attached to equipment or machinery for the purpose of warning personnel not to operate an energy isolating device and identifying the applier or authority who has control of the procedure.

II. Responsibilities

Supervisor

Maintains awareness of all aspects of this lockout/tagout policy.

Ensures that all employees under their supervision understand the requirements for compliance with this policy and are made aware of the lock/tagout procedure and are issued appropriate locks/tags.

Conducts a periodic inspection and yearly retraining of energy control procedures to ensure the requirements of this policy are followed.

Employee

Maintains awareness of all aspects of the lockout/tagout policy and complies with all procedures.

Safety Manager

Provides necessary employee training for lockout/tagout procedures including review and retraining of LOTO policy yearly for all employees.

Conducts periodic inspections of work sites to ensure compliance with lockout/tagout procedures.

Conducts yearly retraining on Lock Out policies and procedures for all employees.

Provides guidance regarding the applicability of the lockout/tagout policy.

Approves/disapproves exceptions of the lockout/tagout policy.

III. **General**

Lockout/Tagout

Implementation of lockout/tagout shall only be performed by authorized employees (see definition).

Before any employee performs any maintenance or repair of a machine or equipment where unexpected startup or release of stored energy could occur and cause injury, the machine or equipment shall be isolated, and rendered inoperative.

If an energy-isolating device is capable of being locked out, then this policy requires that a lockout and tagout be utilized. If an energy-isolating device is not capable of being locked out, then a tagout shall be utilized.

Whenever major replacement, repair, renovation or modification of machines or equipment is performed, and whenever new machines or equipment are installed, energy isolating devices for such machines or equipment shall be designed to accept a lockout device.

Protective Materials and Hardware

Wherever and whenever Conewago employees are utilizing lockout and tagout devices, those devices shall be provided by Conewago and shall be the only authorized devices used by Conewago employees for the lockout of energy devices. Conewago lockout devices shall not be used for any other purpose. The use of company-wide locks and keys is not allowed. Each locking device shall be separately keyed, with no two configurations the same. Each employee utilizing a lockout device will be in control of all keys to that device.

Tagout devices, including their means of attachment, shall be substantial enough to prevent inadvertent or accidental removal. Attachment means shall be non-reusable (nylon cable tie or knotted string).

Preplanning

An initial survey shall be made to determine which switches, valves, or other energy isolating devices apply to the machine or equipment being locked out. More than one energy source may be involved. Energy sources may include:

Electrical
Mechanical
Hydraulic
Pneumatic
Chemical
Thermal
Stored

Any questionable identification of sources shall be cleared by employees with their supervisors. Before lockout begins, job authorization should be obtained from the supervisor.

Only supervisors or authorized individuals (see definition) shall prescribe the appropriate duties and responsibilities relating to the actual details of affecting the lockout/tagout. Energy isolating devices shall be operated only by authorized individuals under the direct supervision of authorized individuals (no third-party interference).

All energy isolating devices shall be adequately labeled or marked to indicate their function.

Where complexity is an issue, a written sequence in checklist form should be prepared for equipment access, lockout/tagout, clearance, release and start-up.

Lockout/Tagout Procedures

Preparation: Notify all affected employees that a lockout is required and the reason for the lockout.

Shutdown: If the equipment is operating, shut it down by the normal stopping procedure. Disconnect switches should never be pulled while equipment is under load. Personnel knowledgeable of equipment operation should be involved with shut down or restart procedures.

Isolation: Operate the switch, valve, or any other isolating device so that the energy source(s) is (are) disconnected or isolated from the equipment. Stored energy, such as that in capacitors, springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure, etc. must also be dissipated, disconnected, or restrained by methods such as grounding, repositioning, blocking, bleeding-down, etc. Pulling fuses is not a substitute for locking out.

CAUTION: Intermittently operating equipment such as pumps, blowers, fans and compressors may seem harmless when dormant. Don't assume that because equipment isn't functioning, it will stay that way.

Application: Lock and Tag the energy-isolating device with an assigned individual lock, even though someone may have locked the control before you. You will not be protected unless you put your own padlock on it. For some equipment it may be necessary to construct attachments to which locks can be applied. An example is a common hasp to cover an operating button. Tags shall be attached to energy isolating devices and to the normal operating controls in such a manner as to preclude operation.

Verification: After ensuring that no personnel can be exposed, and as a check on having disconnected the energy sources, operate the normal operating controls to make certain the equipment will not operate. If there is a possibility of re-accumulation of stored energy to a hazardous level, verification of isolation shall be continued until the maintenance or repair is completed, or until the possibility of such accumulation no longer exists.

Release from Lockout/Tagout

Before lockout or tagout devices are removed and energy is restored to the machine or equipment, inspect the work area to ensure that nonessential items have been removed and to ensure that machine or equipment components are operationally intact.

Check work area to ensure all employees are in the clear.

Notify affected employees that lockout/tagout devices have been removed.

Each lockout/tagout device shall be removed from each energy isolating device by the employee who applied the device.

Restore energy to equipment.

Lockout/Tagout Interruption

In situations where the energy isolating device(s) is locked/tagged and there is a need for testing or positioning of the equipment or process, the following sequence shall apply:

Clear equipment/process of tools and materials.

Clear personnel.

Clear the control of locks/tags according to established procedure.

Proceed with testing/positioning.

De-energize all systems and re-lock/re-tag the controls to continue the work.

Outside Personnel and Subcontractors

Whenever outside service personnel or subcontractors are to be engaged in activities covered by this policy, all parties, including Conewago shall inform each other of their respective lockout or tagout procedures.

Conewago employees shall understand and comply with the restrictions and prohibitions of any contractors' energy control procedures. Outside contractors shall ensure their personnel do likewise for Conewago policies as well as other contractors' policies.

Procedure Involving More Than One Person

In the preceding steps, if more than one individual is required to lock out equipment, each shall place a personal lock and tag on the group lockout device when he/she begins work and shall remove those devices when he/she stops working on the machine/equipment.

Shift Change Coordination

Supervisors shall ensure the continuity of lockout/tagout protection during shift or personnel changes. Each worker shall be responsible for removing his/her own padlock and tag at the completion of his shift. If work is to cease until the following day, the supervisor shall place his personal padlock and tag on the equipment and the workers shall remove their padlocks and tags. When work resumes, the workers shall affix his/her personal lock and tag to the equipment and the supervisor shall remove his lock and tag.

Conditions for Removal of Another Person's Padlock

Lockout/tagout devices shall only be removed by the owner of the device except in the following circumstances:

Owner is incapacitated by illness, etc.

Owner no longer employed by Conewago.

Owner leaves and cannot be reached by telephone. Under this scenario, if the supervisor determines that circumstances warrant the removal of a lockout/tagout device, and every effort has been made to contact the owner of the device, the supervisor may remove the padlock in the presence of another employee. This exception should be noted on the supervisor's daily report.

LOCKOUT / TAGOUT PROCEDURE
AUDIT SURVEY

Audit Date: _____

Machine/Equipment locked or tagged out: _____

_____

Employees involved with servicing, set-up or maintenance:

_____ _____ _____

_____ _____ _____

Compliance with Lockout/Tagout Procedures: YES NO

If NO, explain: _____

_____

_____

_____

Corrective Action Taken: _____

_____

_____

_____

_____

Signature of Person Conducting Audit

LOCK OUT/ TAG OUT PROCEDURE

Machine No: _____ Date: _____
Machine Name: _____ Location: _____
Authorized Employee: Supervisor:

Statement of Use: This procedure describes the minimum steps that authorized employees must use when shutting down this machine for repair, cleaning or related service work. This procedure is designed to inform authorized employees on how to safely shutdown, lock out, release energy, and test machines or equipment before beginning service work. When energy is required for adjusting, fine-tuning, testing, etc., a written alternate procedure shall be used.

Energy Sources and Magnitude

Energy Source (not all inclusive)	Magnitude
Electricity	Volts
Steam	PSI
Gas pressure	PSI
Air pressure	PSI
Hydraulic pressure	PSI
Material flow:	Lbs

1. Prepare for Shutdown

A. Only authorized employees may use this procedure to shut down, de-energize and lockout this machine.

B. Authorized employees shall review this procedure before each shut down. Both the employee and his supervisor shall initial the Procedure Review log after reading the procedure.

C. Authorized employees shall obtain and use the approved lock out / tag out equipment as specified by the Company.

2. Shut Down / Lock Out / Tag Out

A. This machine shall be shut down and locked and/or tagged out in the following manner:

☐ Shut off the machine by ☐ Yes ☐ No
- ☐ Pushing the STOP button.
- ☐ Turning the toggle switch to OFF.

☐ Shut off the electrical power. Turn the power lever at the main electrical disconnect box _____ located at _____ to OFF. ☐ Yes ☐ No

☐ Install a lock/tag to the disconnect lever and box. ☐ Yes ☐ No

☐ Shut off the following heat energy source(s):
- ☐ The steam line - Turn valve _____ located _____ OFF. ☐ Yes ☐ No
- ☐ The steam line - Insert a blank at _____ located _____. ☐ Yes ☐ No
- ☐ Install a lock/tag to the steam blank/valve. ☐ Yes ☐ No
- ☐ The gas line - Turn valve _____ located _____ OFF. ☐ Yes ☐ No
- ☐ The gas line - Insert a blank at _____ located _____. ☐ Yes ☐ No
- ☐ Install a lock/tag to the gas line blank/valve. ☐ Yes ☐ No
- ☐ Other _____

☐ Shut off the air pressure:

☐ Turn valve ____ located at _____ OFF. ☐Yes ☐ No
☐ Insert a blank at _____ located _____. ☐Yes ☐ No
☐ Install a lock/tag to the gas line blank/valve. ☐Yes ☐ No

☐ Close the material flow chute for _____ at _____ ☐Yes ☐ No
☐ Install a lock/tag to the material flow chute opening. ☐Yes ☐ No

The authorized employee(s) locking or tagging out these energy sources shall maintain control of the keys or devices to prevent removal of the locks or tags. ☐Yes ☐ No

3. Release or Isolate Hazardous Energy

The authorized employee shall release or isolate the following hazardous energy from the machine before beginning service work.

A. Release Hazardous Energy

☐ Air pressure, bleed off pressure slowly, using valve at _____. ☐Yes ☐ No
☐ Chemicals, drain slowly using valve at_____. ☐Yes ☐ No
☐ Gas, vent safely, using valve at_____. ☐Yes ☐ No
☐ Hydraulic pressure, release pressure safely, using valve at_____ ☐Yes ☐ No
☐ Steam pressure, vent safely, using valve at _____. ☐Yes ☐ No
☐ Spring tension, relieve slowly, using safe procedures. ☐Yes ☐ No
☐ Capacitors, discharge safely. ☐Yes ☐ No
☐ Counterweight pressure, release safely (if appropriate.) ☐Yes ☐ No

B. Isolate Hazardous Energy

☐ Block off _____ by_____ ☐Yes ☐ No
☐ Blank off _____ by _____ ☐Yes ☐ No
☐ Reposition _____ ☐Yes ☐ No
☐ Position guard at/under _____ ☐Yes ☐ No
☐ Secure _____ by_____ ☐Yes ☐ No
☐ _____ ☐Yes ☐ No

4. Test the Lock Out / Tag Out

After all lock and tags are applied and energy sources have been disconnected, the authorized employee(s) shall try to start the machine using the normal operating controls.

If the procedure has been followed and the machine will not start, it is safe to assume that the machine is properly locked out or tagged out.

NOTE: RETURN THE OPERATING CONTROLS TO NEUTRAL OR "OFF" POSITION AFTER TEST.

5. Restart Procedure

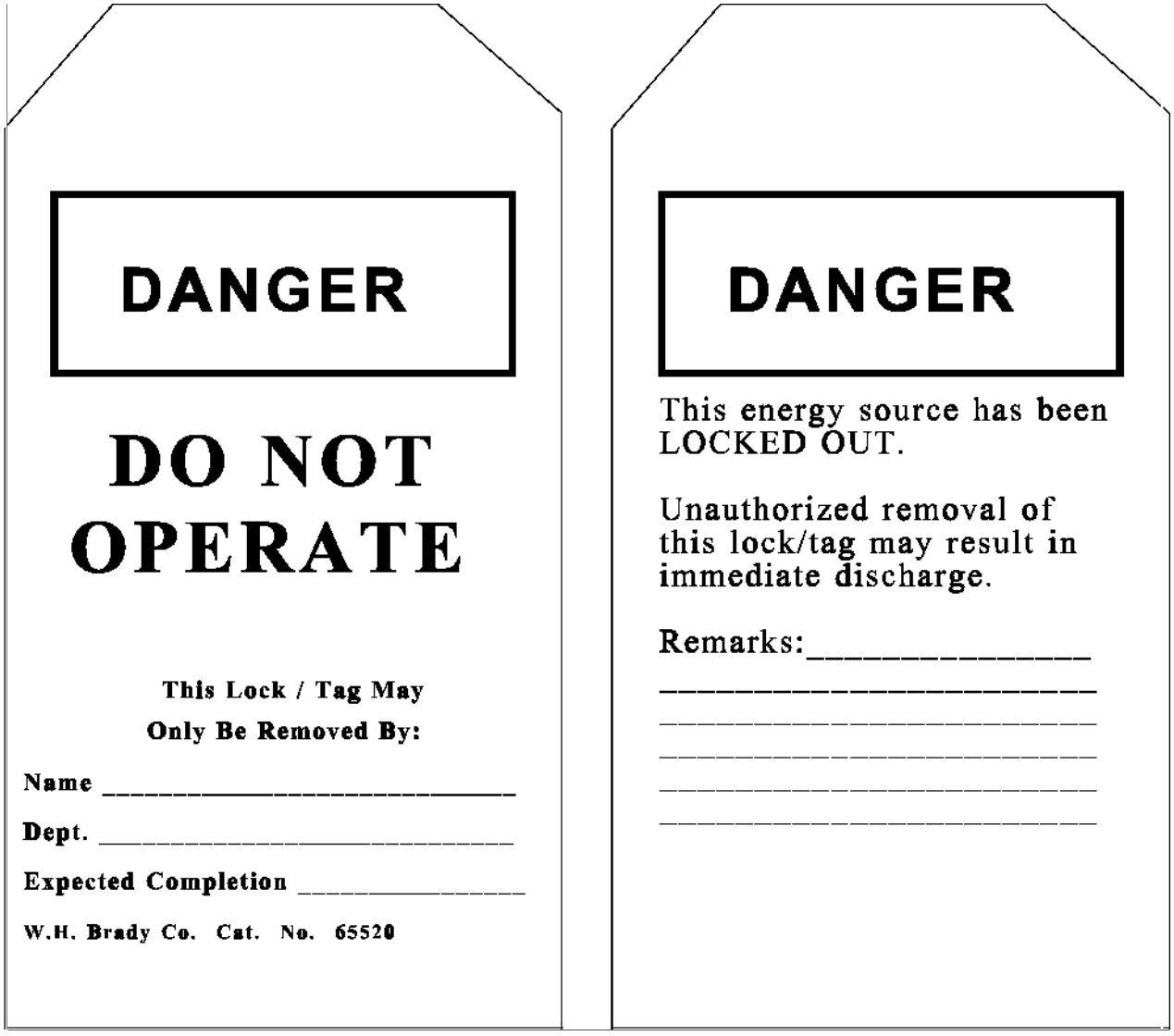
A. Check to make sure that the area and the machine is clear of all people. If more than one worker is involved, all work must be completed before restarting the machine. ☐Yes ☐ No
B. Check the machine to make sure that all tools, materials and items are removed. ☐Yes ☐ No
C. Check the machine to make sure that all connections are in place. ☐Yes ☐ No
D. Make sure that all safety guards are in place. ☐Yes ☐ No
E. Remove locks/tags from energy sources. ☐Yes ☐ No
F. Re-energize the equipment. ☐Yes ☐ No
G. Start the machine using the ON/OFF controls. ☐Yes ☐ No

NOTE: If adjusting, fine-tuning or testing this machine can be done without energy sources, use this Lockout/Tagout procedure. If energy is required, use the written alternate procedure.

Authorized Employee_____Supervisor _____

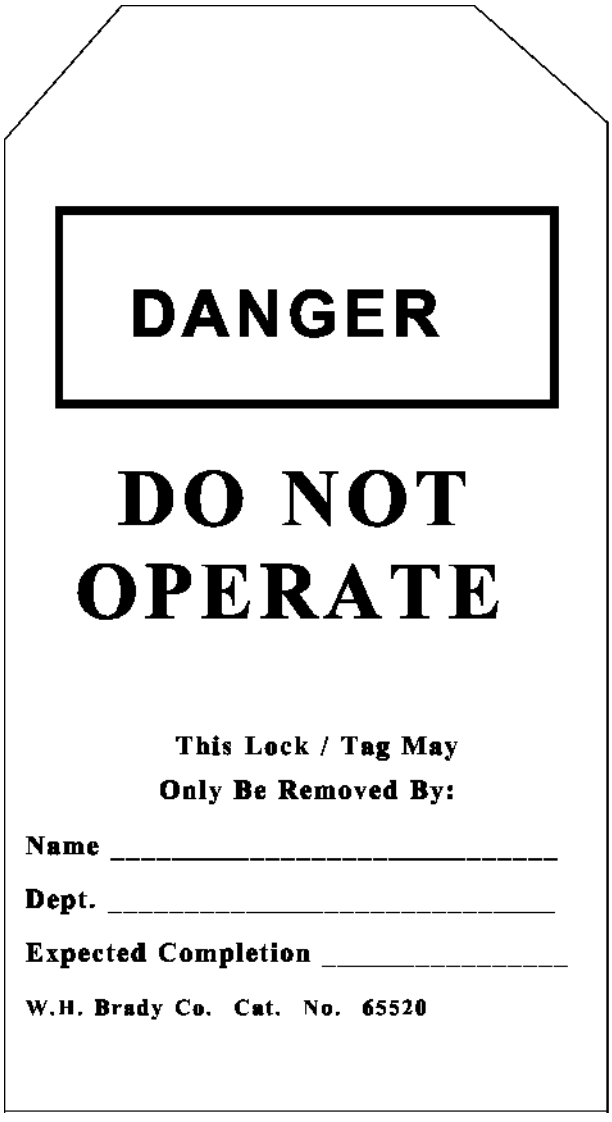
CONEWAGO ENTERPRISES, INC.
CONEWAGO MANUFACTURING, LLC

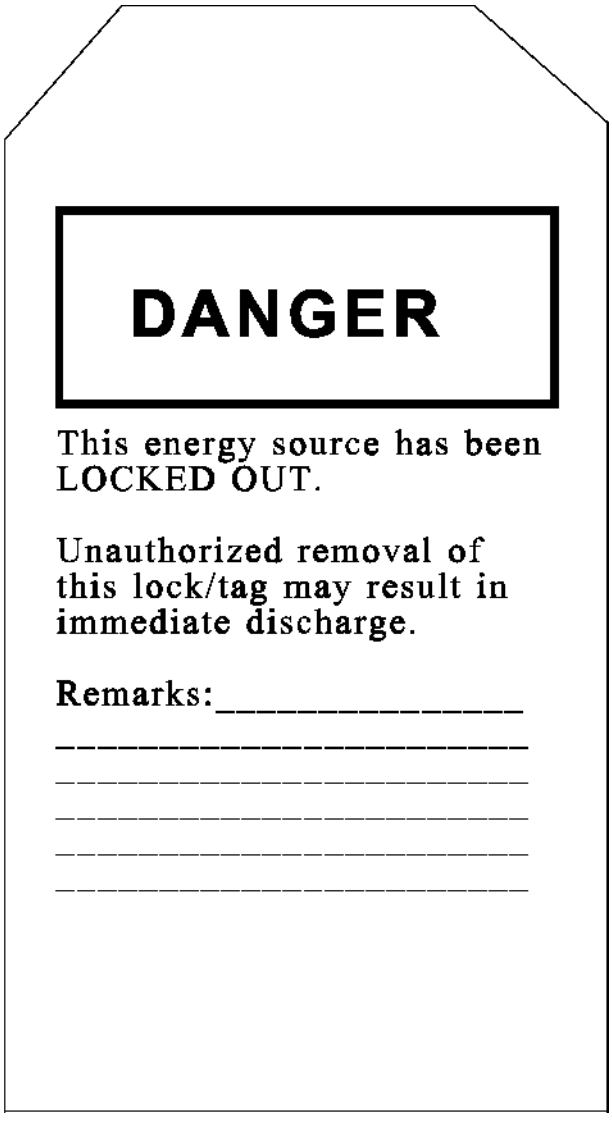
LOCKOUT TAGS



CONEWAGO ENTERPRISES, INC.
CONEWAGO MANUFACTURING, LLC

TAGOUT TAGS





Hearing Conservation Program

Administration

It is the policy of this company to institute an occupational hearing conservation program for our employees to prevent any temporary or permanent noise-induced hearing loss to workers, and to comply with the federal OSHA standard found at 29 CFR 1926.52 and 29 CFR 1910.95.

This written hearing conservation plan serves as a record of the details of the hearing conservation program in place at this company. We have this program in place to protect the hearing of all workers in the company. Elements of the hearing conservation program include:

Monitoring
Audiometric testing program
Hearing protection
Training and information
Recordkeeping

The Safety Director has overall responsibility for coordinating safety and health programs in this company. They are also the person having overall responsibility for the Hearing Conservation Program. The Safety Director will review and update the program as necessary.

Copies of the written program may be obtained from the Safety Department.

Monitoring

The monitoring program is in place to provide an ongoing means of determining employee exposure to noise and protect employees based on excessive exposure.

When information indicates that any employee's exposure may equal or exceed an 8-hour time-weighted average of 85 decibels, the company develops and implements an appropriate monitoring program to identify all employees for inclusion in the hearing conservation program and to select proper hearing protection.

To determine employee exposure to noise, a certified audiologist or other designated person will be employed to conduct monitoring of our job sites and typical operations. Any time our operations change, we will again conduct monitoring of the workplace for noise levels.

The company notifies all employees exposed at or above an 8 hour time-weighted average of 85 decibels of the results of the monitoring by posting in a conspicuous place.

Conewago selects proper hearing devices for affected employees by utilizing Appendix B of 1910.95, "Methods for Estimating the Adequacy of Hearing Protection Attenuation", for our specific work environments.

Monitoring is repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that either additional employees may be exposed at or above the action level or the attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements of noise reduction.

The audiometric program is in place and available at no cost to all affected employees to ensure that noise exposures are kept at proper levels.

Audiometric Testing Program

The program ensures that a valid baseline audiogram is established for exposed employees within 6 months of their first exposure (or within one year if mobile vans are used, with employees wearing hearing protection for any period exceeding 6 months). Ideally, employee testing should be preceded by at least 14 hours of non-occupational noise exposure.

Audiometric testing is repeated annually under the scope of this program.

If a standard threshold shift should occur, Conewago will inform the affected employee in writing within 21 days. In addition, Conewago will:

- Ensure the affected employee who is not using hearing protection will be fitted with hearing protection.
- Go through the refitting and retraining process for employees already using hearing protection.
- Determine if a referral for a clinical audiological evaluation or an ontological examination, as appropriate, is necessary if there is reason to suspect that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.
- Inform the employee of the need for an ontological examination if a medical pathology of the ear is unrelated to the use of hearing protectors is suspected.

If subsequent audiometric testing of an employee whose exposure to noise is less than an 8-hour (time weighted average) TWA of 90 decibels indicates that a standard threshold shift is not persistent, the company informs the employee of the new audiometric interpretation and discontinues the required use of hearing protectors for that employee.

Hearing Protection

The company makes hearing protection available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to the employees.

Conewago ensures use of available hearing protection by all affected employees when necessary, based on the job site hazard assessment.

Conewago ensures employees have a variety of suitable protectors that attenuate (lower) employee exposure at least to an 8-hour time-weighted average of 90 decibels, or 85 decibels or lower for employees who have experienced a standard threshold shift in their hearing.

Conewago has a variety of suitable hearing protection for employees to choose from. All are approved and have appropriate NRR's (Noise Reduction Ratings). Headphones and earbuds are not allowed.

The company ensures evaluation for adequacy of the hearing protection attenuation for the specific noise environments in which the protector will be used, according to the specifications given in Appendix B of 1910.95, "Methods for Estimating the Adequacy of Hearing Protection Attenuation".

The company reevaluates attenuation whenever employee noise exposures increase to the extent that current hearing protectors no longer provide adequate attenuation, and then provides more effective hearing protection.

Training and Information

Conewago has a hearing protection training program for all employees exposed to noise at or above an 8-hour time-weighted average of 85 decibels. All employees exposed above 85 decibels must participate in the hearing protection training program.

Copies of the standard (29 CFR 1910.95, Occupational Noise Exposure), and its appendices are available to affected employees or their representatives. For a copy of the standard contact the Safety Department.

The company repeats the training on an annual basis in the form of annual safety training coinciding with annual audiometric testing. The company assures that the training material is updated to be consistent with changes in the protective equipment and work processes by evaluating all facets of the program and the work environment on an annual basis.

Conewago assures that each affected employee is informed of at least the following information:

The effects of noise on hearing.

The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care.

The purpose of audiometric testing, and an explanation of the test procedures.

The company makes informational materials pertaining to the Occupational Noise Exposure standard (in the form of toolbox safety talks and other handouts) available to employees.

Recordkeeping

Record keeping is an essential element of the hearing conservation program, since it is the means by which hearing levels are tracked and assessed over a period of years.

The company has in place a series of measures to maintain comprehensive and up-to-date records.

Conewago maintains accurate records of all employee exposure measurements required by the monitoring program.

Conewago also maintains accurate records of all employee audiometric test records obtained pursuant to paragraph (g) of 1910.95.

Conewago retains noise exposure measurement records for two years and audiometric test records for the duration of the affected employee's employment plus 30 years.

The company provides access to records to employees, former employees, representatives designated by the individual employee, and OSHA, upon request,

Heat Illness Prevention

Overview and Objectives

This Heat Illness Prevention Plan (HIPP) applies to employees of Conewago who work in outdoor areas of employment or on job tasks where the environmental risk factors for heat illness are present and are at risk for developing heat illnesses if they do not protect themselves appropriately.
Based on the Code of Federal Regulations, this standard applies to all outdoor and indoor places of employment where an employee may be exposed to a heat related hazard that is likely to cause death or serious injury, with the following industries being included and subject to all provisions of the standard:

Agriculture

Construction

General Industry

Maritime

Shipyard

Transportation

Scope

The Conewago HIPP includes steps for ensuring drinking water is provided in sufficient amounts, temperatures and humidity conditions are monitored, shade is available as required by the law, high heat procedures are followed, employee training is in place, emergency response procedures are documented, acclimatization of employees is accounted for, and auditing processes are incorporated to strengthen the plan's success.

Policy

It is the policy of Conewago that any employee participating in job tasks where environmental risk factors for heat illness are present will comply with the procedures in this document and in the Injury and Illness Prevention Program. A copy of this Heat Illness Prevention Plan will be made available at each job site in both English and the language understood by the majority of employees.

Water

Conewago will provide fresh, pure, and suitable cool water, free of charge, as close as practicable to areas where employees are located. Supervisors will visually examine the water to ensure purity and ensure that reasonable measures are taken to keep it cool.

When employees are working in large areas, water will be placed in several locations. Conewago will also place water in designated shade areas and near restrooms.

Conewago will ensure that 1 quart of water per person per hour is available at the start of the shift and will have a water replenishment system (including designated responsibility) in place.
Conewago encourages employees to drink water frequently and to report low water levels, as well as warm or dirty water containers, to supervisors.

Procedures for Monitoring the Weather

Supervisors will be trained and instructed to check in advance the extended weather forecast. Weather forecasts can be checked with the aid of the internet (http://www.nws.noaa.gov/), by calling the National Weather Service phone numbers or by checking the Weather Channel TV Network. The work schedule will be planned in advance, taking into consideration whether high temperatures or a heat wave is expected. Routine advance weather monitoring will take place between the months of May and September; with additional advance monitoring conducted as needed during the remainder of the year.

In addition to advance weather monitoring, supervisors shall utilize one of the aforementioned weather services to review the day's forecasted temperature and humidity level prior to the start of work. Temperature and humidity levels will also be monitored on the work site throughout the day and compared to the National Weather Service Heat Index to evaluate the risk level for heat illness and determine when precautionary heat illness prevention measures should be taken. OSHA-NIOSH Heat Safety Tool application is to be downloaded to all Supervisors company phones to help monitor current conditions. Temperature will be measured in degrees Fahrenheit. Temperature measurements will be taken in work areas where shade is not present.

Shade

Conewago will provide shade when the temperature exceeds 80 degrees Fahrenheit. Shade areas will be open to the air or provided with ventilation or cooling. Enough shade will be provided to accommodate the number of employees on break or recovery period at any given time.

Conewago will ensure that employees in shaded areas can sit in a normal posture fully in the shade without having contact with one another. The shade shall be located as close as practicable to the work area. During meal periods, the amount of shade available shall be enough to accommodate the number of employees on meal break and those seeking cool-down rest periods.

Conewago will encourage employees to take a preventive cool-down and rest in the shade when they feel the need to protect themselves from overheating.
Employees taking cool-down breaks will be monitored and asked if they are experiencing symptoms of heat illness and will be encouraged to remain in the shade until any signs or symptoms have abated. Employees will be given no less than 5 minutes to rest in the shade, in addition to time needed to access the shade.

Conewago policy will be that any employee who exhibits signs or reports symptoms of heat illness while taking a preventive cool-down rest shall be provided with appropriate first aid or emergency response.

High Heat Procedures

Conewago will implement the following high heat procedures when the temperature equals or exceeds 95 degrees Fahrenheit.

- A supervisor, or a qualified person, shall directly observe employees, for signs and symptoms of heat illness. Each supervisor, or qualified person shall be responsible for observing no more than 20 employees.
- If impractical to directly observe employees, a mandatory buddy system shall be implemented or;
- Regular communication with employees working solo shall be implemented by either radio or cellular phone or;
- Other effective observation such as periodic checks.
- Employees shall be observed for symptoms of heat illness and will be reminded throughout the work shift to drink plenty of water.
- Conewago will designate 1 or more employees to call for emergency medical procedures and will allow any employees to call for emergency services when a designated person is not available.
- Conewago will closely supervise new employees for the first 14 days of employment, unless the new employee indicates at the time of hire that they have been doing similar work for at least 10 of the past 30 days, and for more than 4 hours per day.

Training

Conewago will provide training to all supervisors, and affected employees, prior to their engaging in work that could result in exposure to risk factors for heat illness. Training will include:

- An explanation of the employer's responsibility to provide shade, water, cool-down rest periods, and access to first aid, as well as the employee's right to exercise their rights without fear of retaliation.
- Environmental and personal risk factors for heat illness.
- The signs and symptoms of heat illness.
- The importance of immediately reporting signs and symptoms of heat illness – and appropriate first aid to be taken.
- Importance of frequent consumption of water.
- Importance of acclimatization.
- Conewago's response plan to possible heat illness.
- Supervisor and employee responsibilities.
- Supervisors will be taught procedures to follow in case of an employee reporting or displaying symptoms of heat illness.

- Supervisors will be trained how to monitor weather reports and how to respond to hot weather advisories.

Emergency Response Procedures

All supervisors and management personnel of Conewago are required to take immediate action if an employee exhibits signs or symptoms of heat illness. Emergency response procedures will include but not be limited to the following actions:

- Ensuring that effective communication by voice, observation, or electronic means are maintained so that employees at the high temperature work site can contact a supervisor or emergency medical service when necessary.
- Cellphones, company radio, email and other electronic devices will be used for communication. If electronic devices are not reliable forms of communication, Conewago will develop alternative means of summoning emergency medical services.
- Employers and supervisors will be trained to recognize symptoms of heat stress, such as decreased level of consciousness, disorientation, irrational behavior, staggering, vomiting and convulsions; and are required to take immediate action if any employee exhibits signs of the mentioned symptoms of heat illness.
- Supervisors and employees will be trained in first aid measures and how emergency services are to be provided to affected employees.
- Employees exhibiting signs or symptoms will be monitored and shall not be left alone or sent home without being first offered onsite first aid and/or being provided with emergency medical service.
- If deemed necessary, emergency medical services will be contacted, and employees will be transported to a place where they can be reached by emergency medical providers.
- In emergency events – clear and precise directions to the work site will be provided to emergency responders.
- In the event that a work site is in a difficult to find location, an employee will be sent to meet emergency medical services at the nearest landmark; and lead them to the work site.

Acclimatization

- New employees and employees who have not previously worked in environments where the possibility that heat illness may occur will be given an opportunity for their bodies to gradually be exposed to heat.
- Conewago will also monitor employees during a heat wave. “Heat wave” being defined as any day the predicted temperature is at least 80 degrees Fahrenheit and at least 10 degrees Fahrenheit higher that the average high daily temperature in the preceding 5 days. Monitoring can be done by either the supervisor or by use of the buddy system.
- Conewago will stress to new employees the importance of immediately reporting to their supervisor symptoms and signs of heat stress in themselves or in co-workers.

Heat Illness Prevention Plan Audit

Conewago as part of the implementation of our Injury & Illness Prevention Program, and to ensure the success of our HIPP, will conduct an audit of our written plan and documentation by Supervisors and Managers. Audits of the HIPP will be conducted annually. The audit shall review the plan to ensure that the heat illness prevention procedures continue to be effectively implemented. This will include, but is not limited to:

- Ensuring that suitably fresh and cool water is routinely provided in the required amounts.
- Ensuring sufficient shade is routinely made available.
- Verifying that the required supervisor and employee training has been completed.
- A review of the effectiveness of emergency response procedures.
- Ensuring that employees are acclimatized as required.
- Ensuring that high heat procedures are implemented when the temperature reaches 95 degrees Fahrenheit.

Jobsite Security

The purpose of this program is to prevent any form of theft or vandalism at our jobsite locations.

The following is a list of preventive measures that we require all of our employees to follow:

JOBSITE GROUNDS

1. Only those employees directly related to the work being performed during construction should have access to the jobsite.

2. “NO TRESPASSING” signs are to be posted on every jobsite in a manner in which they can be seen from any direction.

3. “CAUTION” tape and safety fences are to be utilized to prevent access to any potentially hazardous areas.

OFFICE, STORAGE AND TOOL TRAILERS

1. All trailers are to be locked when not in use.

2. Only those who are employed by Conewago shall have access to the job trailers. All others must be authorized by the jobsite superintendent.

TOOLS AND EQUIPMENT

1. No keys shall be left in equipment at any time.

2. All job box or toolbox bins on our pick-up trucks or service trucks are to be locked at all times.

3. All tools or small equipment are to be stored in a gang box or trailer when not in use.

4. All tools and equipment are to be “Conewago” painted or engraved on them.

5. Concrete saws, generators, and all other small gas or electric powered equipment are to be chained and locked on the back of pick-up trucks when not in use.

ENTRY

1. All Onsite Employees, vendors, delivery persons, and visitors must be readily identified by company logo or other means displayed on their hardhat, work

clothes, or Employee Identification Badge. ***Employees shall not display logos of companies they do not represent.***

2. Any visitor, delivery person or vendor who has business at the jobsite is the responsibility of the company responsible for his presence onsite and must be escorted by a representative of the company at all times while onsite.

3. The subcontractor accepts all responsibility for any visitor, vendor, or delivery person, associated with their work onsite.

PRESENCE

1. All Employees are required to report to their supervisors when they arrive at their assigned work area and before they depart at the end of the work day.

2. All Subcontractors will advise the Conewago Site Supervisor whenever the subcontractor will have personnel working onsite during hours when the Conewago Superintendent or his representative will not be present.

3. Subcontractors are expected to provide supervision of their employees (plus any and all second tier subcontract employees) at all times while work is conducted on their behalf onsite.

4. All vehicles, gang boxes, and other containers capable of concealing drugs, weapons, contraband, or stolen property are subject to search by Conewago at any time while on property under the control of Conewago.

EXIT

Upon the end of work each day it is the responsibility of the subcontractor safety coordinator to make sure their work area has been made safe. All openings or other exposed dangers will be covered or barricaded to prevent accidents. Materials must be secured against high winds and other extreme weather conditions. Protect valuables by securing them properly or taking them with you when you leave the jobsite. All fire hazards will be checked for safety. All electrical hazards must be de-energized or otherwise made safe as required by Code and/or OSHA regulations.

VEHICLE ENTRY

1. Only necessary work vehicles (used to carry equipment and/or personnel) shall be driven beyond the Job Site entrance.

2. All non-essential vehicles should be parked outside the Job Site in designated parking areas. Visitors, vendors, or delivery persons are not permitted to drive vehicles beyond the jobsite entrance without the express permission of the Conewago Site Superintendent.

3. Drivers must obey and ensure the following general vehicle safety rules:

    a. Pedestrians have the right of way at all times.
    b. All speed limits and other traffic control signs must be obeyed.
    c. No passengers are permitted in the rear of moving pickup trucks. Riding on the side or on the tailgate of any vehicle is strictly prohibited. Personnel may not ride or stand in buckets or ride on any equipment where a passenger seat is not provided.

4. When leaving a vehicle unattended onsite, the ignition must be shut off and the key left in the ignition.

5. Vehicles are not allowed inside partially constructed buildings unless permitted by the Conewago Site Superintendent. **NO** vehicle shall be inside a building with the engine running unless it is engaged in actual construction activities (and is permitted by the Conewago Site Superintendent).

Ladder Safety

A. Inspections

1. Ladders shall be maintained in good condition at all times.

2. All ladders must be inspected prior to each use. The inspection shall include, but not be limited to:

    a. The joint between the steps and side rails shall be tight;
    b. All hardware and fittings should be securely attached;
    c. Movable parts shall operate freely without binding or undue play;
    d. Frayed or badly worn rope shall be replaced;
    e. Check for missing steps, rungs, or cleats, broken side rails, or other faulty equipment;
    f. Check for proper bases or feet.

3. Damaged ladders must be tagged out of service and taken to the warehouse for a replacement.

B. Safety Precautions

The following safety precautions shall be observed in connection with the use of ladders;

a. Portable rung and cleat ladders shall be used at such a pitch that the horizontal distance from the support to the foot of the ladder is one-quarter (1/4) of the working length of the ladder;
b. The ladder shall be placed as to prevent slipping;
c. Ladders shall not be placed on boxes, barrels, or other unstable bases to obtain additional height;
d. Ladders shall not be placed in front of doors opening toward the ladder unless the door is blocked open, locked, or guarded;
e. Ladders shall be tied off at the top;
f. Ladders used to gain access to roof shall extend at least three (3) feet above the point of support;
g. While climbing a ladder, both hands should be used to hold onto the side rails;
h. Do not carry tools or other objects in your hands. Use a hand line, if necessary to raise or lower tools;
i. Do not work from the top three rungs of single or extension rung ladders;
j. Do not stand on the top two rails of step ladders;
k. When working from a ladder, both feet must be kept on the ladder rungs or steps;
l. Your waist must be kept within the boundary of the side rails;

C. Loads

Self-supporting (foldout) and non-self-supporting (leaning) portable ladders must be able to support at least four times the maximum intended load, except extra-heavy-duty metal or plastic ladders, which must be able to sustain 3.3 times the maximum intended load

D. Angle

1. Non-self-supporting ladders, which must lean against a wall or other support, are to be positioned at such an angle that the horizontal distance from the top support to the foot of the ladder is about 1/4 the working length of the ladder.

2. In the case of job-made wooden ladders, that angle should equal about 1/8 the working length. This minimizes the strain of the load on ladder joints that may not be as strong as on commercially manufactured ladders.

E. Rungs

1. Ladder rungs, cleats, or steps must be parallel, level, and uniformly spaced when the ladder is in position for use. Rungs must be spaced between 10 and 14 inches apart.

2. For extension trestle ladders, the spacing must be 8-18 inches for the base, and 6-12 inches on the extension section.

3. Rungs must be so shaped that an employee's foot cannot slide off, and must be skid resistant.

F. Slipping

1. Ladders are to be kept free of oil, grease, wet paint, and other slipping hazards.

2. Wood ladders must not be coated with any opaque covering, except identification or warning labels on one face only of a side rail.

G. Other Ladder Requirements

1. Foldout or step ladders must have a metal spreader or locking device to hold the front and back sections in an open position when in use.

2. When two or more ladders are used to reach a work area, they must be offset with a landing or platform between the ladders.

3. The area around the top and bottom of ladder must be kept clear.

4. Ladders must not be tied or fastened together to provide longer sections, unless they are specifically designed for such use.

5. Never use a ladder for any purpose other than the one for which it was designed.

Material Handling / Rigging

The process of lifting equipment, materials and personnel must be performed in an efficient, effective and safe manner at all times to prevent personal injury and damage to equipment and property. The lifting equipment manufacturer's specifications and limitations applicable to the operation of any company cranes, either owned or leased, will be followed. Where manufacturer's specifications are not available, the limitations assigned to the equipment shall be based on the determinations of a qualified engineer competent in this field and such determinations will be appropriately documented and recorded. Attachments used with cranes shall not exceed the capacity, rating, or scope recommended by the manufacturer.

The Safety Department is responsible for the implementation and continuous application of this program. They will have the authority to stop work until proper corrective actions are taken to address deficiencies in the application of this program.

Supervisor / Foreman

- Know when hoisting and rigging techniques are necessary
- Ensure equipment is properly maintained
- Ensure workers use safe lifting techniques

Employee

- Know how to perform necessary equipment inspections
- Know how to maintain equipment
- Use safe lifting techniques

Safe operating requirements

All workers who use any company owned crane or hoist will have an operator's license. The company issues licenses for authorized employees who have been specifically trained in crane and hoist operations and equipment safety.

To be qualified as a crane and hoist operator, the candidate will have received hands-on training from a licensed, qualified crane and hoist operator designated by the candidate's supervisor.

Work shall proceed only when electrical distribution and transmission lines have been de-energized and visibly grounded at point of work or where insulating barriers exist. No part of machinery or attachment of machinery can be erected unless it is done so in a way as to prevent physical contact with the lines. If operations will take place near power lines it can only be done in accordance with the following:

- For lines rated 50 kV. or below, minimum clearance between the lines and any part of the crane or load shall be 10 feet

- For lines rated over 50 kV., minimum clearance between the lines and any part of the crane or load shall be 10 feet plus 0.4 inch for each 1 kV. over 50 kV., or twice the length of the line insulator, but never less than 10 feet

- A person shall be designated to observe clearance of the equipment and give timely warning for all operations where it is difficult for the operator to maintain the desired clearance by visual means

- Any overhead wire shall be considered energized unless and until the person owning such line or the electrical utility authorities indicate that it is not an energized line and it has been visibly grounded.

Site personnel will not be allowed under a suspended load at any time. This restricted area is also applicable to the fall zone around a partially raised piece of equipment or material lifted into a vertical position. Tag lines or the pre-positioning of equipment or materials will be used in lieu of working under a suspended load.

All affected site personnel will wear appropriate PPE to include at a minimum, hard hats and safety toe shoes during any rigging or lifting operation.

Rigging operations

All rigging equipment will be inspected daily and tested annually; defective equipment will be removed from service and destroyed to prevent inadvertent use. The load capacity limits will be stamped or otherwise affixed to all rigging components. Capacity limits will not be exceeded.

Conewago policy requires that all rigging equipment be tested to withstand a minimum safety factor of 2 times the maximum intended load for wire rope and nylon slings. The following conditions will be the basis for rigging equipment being rejected or destroyed:

Nylon slings with:
- Abnormal wear
- Torn stitching
- Broken or cut fibers

Discoloration or deterioration

Wire-rope slings with:
- Kinking, crushing, bird-caging, or other distortions
- Evidence of heat damage
- Cracks, deformation, or worn end attachments
- Six randomly broken wires in a single rope lay
- Three broken wires in one strand of rope
- Hooks opened more than 15% at the throat
- Hooks twisted sideways more than 10deg. from the plane of the unbent hook

Alloy steel chain slings with:
- Cracked, bent, or elongated links or components
- Cracked hooks
- Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed

Rigging a load

When rigging a load, the following procedures will be followed:

- Determine the weight of the load
- Do not rely on estimated weights
- Determine the proper size for slings and components

- Do not use manila rope for rigging
- Make sure that shackle pins and shouldered eye bolts are installed in accordance with the manufacturer's recommendations
- Make sure that ordinary (shoulder less) eye bolts are threaded in at least 1.5 times the bolt diameter
- Use safety hoist rings (swivel eyes) as a preferred substitute for eye bolts wherever possible
- Pad sharp edges to protect slings
- Wood, tire rubber, or other pliable materials may be suitable for padding
- Do not use slings, eye bolts, shackles, or hooks that have been cut, welded, brazed, are missing safety latches or are otherwise modified
- Install wire-rope clips with the base only on the live end and the U-bolt only on the dead end
- Follow the manufacturer's recommendations for the spacing for each specific wire size
- Determine the center of gravity and balance the load before moving it
- Initially lift the load only a few inches to test the rigging and balance.

Selection, use and inspection of slings

Employees involved in hoisting and rigging will exercise care when selecting and using slings. The selection of slings should be based upon the size and type of the load, and the environmental conditions of the workplace. Slings will be visually inspected before each use to ensure their effectiveness.

Improper use of hoisting equipment, including slings, may result in overloading, excessive speed (e.g., taking up slack with a sudden jerk, shock loading), or sudden acceleration or deceleration of equipment.

There are six types of slings that may be used on site and they include: chain, wire rope, metal mesh, natural fiber rope, synthetic fiber rope, or synthetic web. Factors that will be considered when choosing the best sling for the job include size, weight, shape, temperature, and sensitivity of the material being moved, and the environmental conditions under which the sling will be used. The following guide may be useful in selecting the appropriate sling:

- Chain slings must be visually inspected prior to use. During the inspection, pay attention to any stretching, nicks, gouges, and wear in excess of the allowances made by the manufacturer. These signs indicate that the sling may be unsafe and must be removed from service immediately.
- Wire rope slings must be visually inspected before each use. Slings with excessive broken wires, severe corrosion, localized wear, damage to end-fittings (e.g., hooks, rings, links, or collars), or damage to the rope structure (e.g., kinks, bird caging, distortion) must be removed from service and discarded.
- Fiber rope slings deteriorate on contact with acids and caustics and, therefore, must not be used around these substances. Fiber rope slings that exhibit cuts,

gouges, worn surface areas, brittle or discolored fibers, melting, or charring must be discarded. A buildup of powder-like sawdust on the inside of a fiber rope indicates excessive internal wear and that the sling is unsafe. Finally, if the rope fibers separate easily when scratched with a fingernail, it indicates that the sling has suffered chemical damage and should be discarded.

- Synthetic web slings must be inspected before use and should be removed from service if found to have acid or caustic burns, melting or charring of any part of the surface, snags, tears, or cuts, broken stitches, distorted fittings, or wear or elongation beyond the manufacturer's specifications.

Safe lifting practices

Selection of the sling is only the first step in the rigging process. The next step is learning how to safely use it to hold and move a suspended load. There are four primary factors to consider when lifting a load safely which are:

- *Load size, weight, and center of gravity* – The center of gravity of an object is that point at which the entire weight may be concentrated. To make a level lift, the hoist hook must be located directly above this point. If the hook is too far to either side of the center of gravity, dangerous tilting will result, causing unequal stress in the sling legs. Load imbalances must be corrected immediately.
- *Number of legs and angle with the horizontal* – The smaller the angle between the sling legs and the horizontal, the greater the stress on the individual sling legs. This increased stress effectively decreases the weight that can be safely lifted with any given sling size. Large (heavy) loads can be safely moved by keeping this angle as large as possible and, when necessary, distributing the weight of the load among more sling legs.
- *Rated capacity of the sling* – The rated capacity of a sling varies depending upon the type of material the sling is made of, the size of the sling, and the type of hitch. Workers must know the capacity of the sling and can obtain this information through charts or tables available through the manufacturer. The rated capacity of a sling must not be exceeded, under any circumstances.
- *History of care and use* – Mishandling and misuse of slings are the leading causes of sling failure. Following the manufacturer's recommendations for proper care and use are essential for maximum sling service life and safety.

Training

Workers involved in hoisting and rigging operations will receive training in the following:

- Sling and hitch types
- Sling capacity determination
- Equipment inspection, care, and maintenance
- Load weight and center of gravity determination
- Safe lifting techniques

Operation rules

Pre-operational test

At the start of each work shift, employees will perform the following steps before making lifts with any crane or hoist:

- Test the upper-limit switch. Slowly raise the unloaded hook block until the limit switch trips.
- Visually inspect the hook, load lines, trolley, and bridge as much as possible from the operator's station; in most instances, this will be the floor of the building.
- If provided, test the lower-limit switch.
- Test all direction and speed controls for both bridge and trolley travel.
- Test all bridge and trolley limit switches, where provided, if operation will bring the equipment near the limit switches.
- Test the pendant emergency stop.
- Test the hoist brake to verify there is no drift without a load.
- If provided, test the bridge movement alarm.
- Lock out and tag for repair any crane or hoist that fails any of the above tests.

Moving a load

- Center the hook over the load to keep the cables from slipping out of the drum grooves and overlapping, and to prevent the load from swinging when it is lifted. Inspect the drum to verify that the cable is in the grooves.
- Use a tag line when loads must traverse long distances and or must otherwise be controlled. Manila rope may be used for tag lines.
- Plan and check the travel path to avoid personnel and obstructions. Employees are never to be under suspended loads.
- Lift the load only high enough to clear the tallest obstruction in the travel path.
- Start and stop slowly.
- Land the load when the move is finished. Choose a safe landing.
- Never leave suspended loads unattended. In an emergency where the crane or hoist has become inoperative, if a load must be left suspended, barricade and post signs in the surrounding area, under the load, and on all four sides. Lock open and tag the crane or hoist's main electrical disconnect switch.

Hand signals

- Signals to the operator shall be in accordance with the standard hand signals unless voice communications equipment (telephone, radio, or equivalent) is used. Signals shall always be discernible or audible. Some special operations may require addition to or modification of the basic signals. For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator and shall not be in conflict with the standard signals.

Machine Guarding Program & Procedures

Program

Goal: To prevent injuries related to any hazardous machine part, function, or process by developing a safe and effective machine guarding program.

OSHA requires guarding for any machine where machine parts, functions, or processes may cause injury. Machine guarding hazards may be found in academic departments such as chemistry/biology/physics, athletics, studio arts, print shops, as well as the more traditional maintenance shops, carpenter shops, mechanical rooms, and boiler plants.

Any machine part, function, or process that might cause injury must be safeguarded from accidental contact. OSHA Standard 29 CFR 1910 Subpart O (1910.211 – 1910.219)

Responsibilities and Program Components

Supervisors

- Ensure all machines/equipment are equipped with appropriate safeguards – identify potential equipment hazards, request hazard assessment from Safety Office, implement any corrective actions identified in a timely manner.
- Provide personal protective equipment to operators.
- Ensure operators do not remove or operate machine without machine safeguards.
- Ensure operators implement all safety program requirements.
- Provide machine/process specific hands-on training to all operators.

Safety Director

- Provide or assist in conducting machine safeguard assessments and audits for Departments.
- Assist in selection of personal protective equipment and/or appropriate safeguards.
- Develop and provide OSHA machine guard training for affected employees.
- Ensure Supervisors implement safety program requirements

Employees

- Operate machines with all safeguards in place and follow safety program requirements.

- Wear PPE and follow safe LOTO procedures for maintenance/repair (changing blades, etc.).

Standard Operating Procedure

Conduct a pre-startup inspection of equipment and safeguards

- Electric cords, guards, blades, exhaust ducts, etc.

Adjust guard to fit each specific task (adjustable guards on band saws, etc.)

Report or replace missing or damaged guards

- Sign machine “Danger: Do Not Use” until it is properly guarded
- Do not operate machine/equipment if it does not have necessary guards

Wear appropriate PPE (safety glasses)

Do not wear loose clothing and jewelry; and tie back long hair

Shut down LOTO (de-energize) equipment/machine prior to performing maintenance/repair (changing blades, grinding wheels, lubrication, etc.)

- Equipment with standard type electrical plug and cord can be unplugged and under the control of the operator to meet the lock-out procedure

Leave equipment/machine in good, clean, operating condition

Mobile Crane and Excavator Safety

Purpose

To ensure safe operating practices for mobile crane and excavator usage.

Operator's Responsibilities

Safety must always be the operator's most important concern. He must refuse to operate when he knows it is unsafe and consult his supervisor when safety is in doubt.

He must read and understand the Operator's Manual kept in the cab and see that the machine is in proper order before operating.

He must understand how to read the rating plate and know that his machine can safely lift each load before attempting to lift it.

He must be alert, physically fit, and free from the influences of alcohol, drugs, or medications that might affect his eyesight, hearing, or reactions.

He must see that people, equipment, and materials are kept out of the work area. The area around the machine should be properly barricaded.

When an operator's vision is blocked or when operating in hazardous areas such as near power lines or around people, a signalman must be used. Because the operator is not in the best position to judge distances and cannot see all parts of the jobsite, a signalman may also be necessary at other times. Operators must understand standard crane signals and take signals only from designated signalmen.

Signalman's Responsibilities

The primary duty of a signalman is to assist the operator in safe and efficient operation. Operators depend on designated signalmen to assist them in making movements without endangering people or property.

Signalmen must have a clear understanding of the work to be done so that they can safely coordinate each job with operators and other crew members.

Signalmen must place themselves where they can be clearly seen and where they can safely observe the entire operation. Standard crane signals must be used unless other methods of signaling such as two-way radios or flags have been agreed upon.

Responsibilities of all Crew Members

Any unsafe condition or practice must be corrected or reported to the job supervisor.

Everyone who works around cranes and excavators, including riggers and oilers, must obey all warning signs and watch out for his own safety and the safety of others. Crew

members setting up machines or handling loads are expected to know proper machine erection and rigging procedures.

Watch for hazards during operations and alert the operator and signalman of dangers such as power lines, the unexpected presence of people, other equipment, or unstable ground conditions.

Management Responsibilities

See that operators are trained, competent, physically fit and, if required, licensed. Good vision is required, as are good judgment, coordination, and mental ability. Any person who lacks any of these qualities must not be allowed to operate a crane or excavator.

Signalmen must have good vision and sound judgment, know standard crane signals, and be able to give signals clearly. They must have enough experience to be able to recognize hazards and signal the operator to avoid them.

Riggers must be trained to determine weights and distances and to select and properly use lifting tackle. Rigging is a complex subject far beyond the scope of this policy. It is management's responsibility to see that riggers are properly trained. Employees must complete company rigging training before operating any crane or equipment used to lift or carry materials.

Crew members must be given specific safety responsibilities and instructed to report any unsafe conditions to their supervisors.

Planning the Job

Most accidents can be avoided by careful job planning. The person in charge must have a clear understanding of the work to be done, consider all the dangers at the jobsite, develop a plan to do the job safely, and then explain the plan to all concerned. Factors such as these should be considered:

- What crew members are needed and what responsibilities will they be given?
- What is the weight of the load to be lifted, the left radius, boom angel, and the rate capacity of the crane?
- How will the signalmen communicate with the operator?
- What equipment is required to do the job safely? Is a crane or excavator the best equipment for the job?
- How can the equipment be safely transported to the jobsite?
- Are there gas lines, power lines or structures that must be moved or avoided?
- Is the surface strong enough to support the machine and load?
- How will the loads be rigged?
- What special safety precautions will be taken if a crane must travel with a suspended load or if more than one crane is needed to lift a load?
- Are unusual weather conditions such as winds or extreme cold expected?
- What steps will be taken to keep unnecessary people and equipment safely away from the work area?
- How can cranes be positioned to use the shortest boom and radius possible?

Operator's Safety Check

The operator must make a safety check before starting to work each day to see that the machine is in proper order. Some things to check are:

Check the machine log book to see that periodic maintenance and inspections have been performed and all necessary repairs made.
Check the operation of the boom hoist kick out, boom angel indicator, backup alarms, and other safety devices.
Carefully inspect load-bearing parts such as wire rope (load lines, boom hoist cable, and suspension lines), boom, outriggers, and hooks.
Be sure no unauthorized field modifications have been made such as added counterweights and booms that have been improperly repaired.
Check for air and hydraulic oil leaks.
After starting the engine, check all gauges for proper readings.
Test all controls for proper operations.
Check brakes and clutches. Test load brakes by lifting a load a few inches off the ground and holding it.

Operating Precautions

1. Mistakes in calculating lifting capacity can cause accidents.
Several factors must be considered, including:

a. Load ratings (the distance between the center of the crane rotation to the center of the load). Note that the radius will increase when the load is lifted.

b. Weight of the load, hook and rigging.

c. Boom length, jib, parts of line and operating area (side, rear).

Use the next lower rating capacity when working at boom lengths or radii between the figures on the rating chart. It is dangerous to guess the capacity for boom lengths or radii between those listed on the rating chart. Trying to lift a load without knowing if it is within the rated capacity, in expectation the crane will start to tip, to warn of an overload, is very dangerous. Cranes may suddenly tip over or collapse if the load is too heavy. Always stay within the rated capacity. The operator must reduce the load under the adverse field conditions until, in his judgment; the machine can safely handle the lift.

2. Cranes and excavators may tip over or collapse if the operating surface cannot support their weight. Timber mats, steel plates or concrete rafts may be needed under outrigger pads of crawlers to distribute the load under the crane so that the bearing strength of the ground is not exceeded. Determine the load bearing capacity of the ground or other surface on which machines will be operating. Be sure cranes and excavators are adequately supported. Avoid soft or unstable ground, sand, areas with high water tables, and partially frozen ground. When machines are working near trenches, the trenches should be shored or sloped to prevent cave-ins or slides.

3. The rated capacity of a crane is determined with the crane leveled within 1% of grade (1 foot drop or rise in 100 foot distance). Out of level more than 1% will drastically reduce the lifting capacity.

4. People can be crushed by the scissors-like action of the upper rotating on the lower. Stay away from rotating cranes and excavators. Erect barricades to keep people away. Take the time to determine that these areas are clear before swinging.

5. People can be crushed by the rear (counterweight) of the machine if there is not enough room to swing. Position machines so that people cannot be trapped between the counterweight and other obstructions.

6. Many people have been injured when riding crane hooks or loads or while being lifted in man baskets. They have no control over how they are handled and no protection from impacts or falls. Small mistakes can be fatal. Do not lift people with cranes. Use ladders, scaffolds, elevating work platforms or other equipment designed to lift people, but do not use cranes.

7. Power lines have killed or seriously injured people working around cranes and excavators. These accidents can be avoided by following a few simple rules. Always determine if there are power lines in the area before starting any job. OSHA regulations require at least ten (10) feet of clearance from lines carrying 50,000 volts or less. Greater clearances are required for lines with higher voltages. Some states require greater clearances than OSHA. Safety requires that you stay as far as possible from power lines and never violate minimum clearances. Always take these precautions if power lines are present:

    a. Notify the power company before beginning work.

    b. You and the power company must take specific precautions. These may include locating cranes and materials away from the power lines, de-energizing and grounding lines, rerouting lines, removing or barricading lines, and insulating lines with rubber sleeves.

    c. Use a signalman to maintain a safe distance between any part of the machine or load and power lines. The operator is not in the best position to judge distance.

    d. Warn people to stay away from the machine and load at all times. If the load must be guided into place, ask the power company about special precautions such as insulated poles or hot sticks.

    e. Slow down. Give yourself time to react to problems and to double check the distance between power lines and any part of the machine or load.

        Warning: Careful planning and supervision offer better protection than any known device. Insulated boom cages, proximity warning devices, and insulating links have limitations and can fail without warning. Insulated boom cages and links only protect part of the crane and can break down electrically when contaminated with dust and water. Operation of proximity warning

devices can be affected by a combination of the movement of trucks and materials and even the position of power lines in addition to many other influences. Relying on any of these devices could be dangerous because operators may think they are providing protection when in fact they are not.

8. The load line can break if the hook block contacts the end of the boom. This is called "two blocking." Two blocking can be caused by hoisting the hook into the end of the boom, lowering the boom or extending the telescopic boom without paying out load line. Two blocking can pull jibs and lattice crane booms over backwards. Always keep space between the hook block and the boom point. Lower the hook when extending the telescopic booms to avoid the blocking.

9. People can be injured if the hook, boom, load or outriggers are moved before everyone is clear. Make sure that everyone is in a safe place before moving the hook, boom, load or outriggers. Do not move loads over people. Do not allow the load to bump or catch on anything.

10. Rapid swings or sudden starts and stops can cause the hook and attached load to swing out of control. Always start and stop movements smoothly and swing at speeds that will keep the load under control.

11. Dirty windows, darkness, bright sunlight, fog, rain, and other conditions can make it difficult for the operator to see.

12. Even light winds can blow loads out of control, collapse booms, or tip machines. Winds aloft can be much stronger than at ground level. Do not lift loads if winds create a hazard. Lower the boom if necessary. See the rating plate for possible restrictions.

13. Carelessness in getting on and off equipment can result in serious injury. Always wait until the machine has stopped. Do not jump on or off. Always use both hands and make sure you have good footing.

14. Slippery floors and steps, tools, trash, or other loose items can cause falls. Keep the machine clean and dry.

15. Damaged crane booms may collapse. Lattice type booms will be weakened by damaged chords, bent or missing lacings, or cracked welds. Telescopic booms will be weakened by distorted bottom or side plates. In either case, the loss of strength is difficult to estimate.

16. Crane booms can buckle if side loaded (pulled sideways). Typical causes of side loading are rapid starts and stops while swinging, dragging a load sideways, winds, or lifting when the crane is not level. Take care to avoid side loading.

17. If the load strikes the boom or the boom hits a building or other object, the boom may collapse. Never let the load or any other object strike the boom.

18. Boom suspension lines will stretch when the load is lifted and contract when the load is released. At high boom angles, this may be enough to pull the boom

backwards over the crane. When releasing loads, be sure the boom never tightens against the backstops. Release loads slowly.

19. The load will swing out of control if it is not directly beneath the boom point when lifted. This can side load the boom and may cause the crane to tip or collapse. Always place the boom point directly above the load when lifting.

20. Trying to lift a load that is stuck, frozen, or attached to something else may result in tipping, boom collapse, or other damage. Be sure that loads are free before lifting.

21. If there is not enough wire on the drum, the rope can be pulled off. Keep at least two full wraps of wire rope on drums when operating.

22. Foot pedal brake locks are furnished on some cranes to allow the operator to rest his legs when suspending the load for short periods of time. Keep your feet on the pedals while foot pedal brake locks are in use. Brakes may fail, allowing the load to fall.

23. Trying to repair or adjust equipment with a suspended hook or load or with the boom raised could release machinery and let it move unexpectedly. Always lower the load to the ground and the boom onto proper cribbing before doing maintenance work.

24. Pressure in hydraulic systems can be retained for long periods of time. If not properly released before maintenance people attempt to work on the hydraulic system, this pressure can let machinery move or cause hot oil an hose ends to shoot out at high speed. Release system pressure before attempting to make adjustments or repairs.

25. Pin-connected booms and jibs may fall if not properly supported when removing pins. Make sure both ends of each boom and jib section are supported and the boom suspension lines completely slacked off before removing pins. Never stand on, inside, or under booms or jibs during assembly or disassembly.

26. As with all heavy equipment, care must be taken when cranes or excavators are driven (traveled), whether on or off the jobsite. Watch for people, power lines, low or narrow clearances, bridge or road load limits, and steep hills or uneven terrain. Use a signalman in close quarters. Know the heights, width, and weight of your machine. Retract and lock outriggers, place the boom in the cradle, and set swing brake or lock before traveling.

27. Load ratings for cranes are based on the machine being stationary and level. Traveling a crane with a suspended load or with the boom erected involves special hazards, including the possibility of side loading or tipping over. Because of the many variables involved in pick and carry operations, the user must evaluate conditions and take precautions such as these:

    Follow the travel precautions listed in Rule #26.
    Check the rating plate for limitations.
    Position the boom in line with the direction of travel.

Reduce the maximum load while traveling to reflect operating conditions. The safe load will vary depending on speed, crane, terrain, and other conditions.
Inflate tires to specified pressure.
Travel slowly and avoid sudden stops and starts.
Avoid backing away from the load. This could increase the radius and cause the machine to tip over.
Use tag lines to keep loads under control.
Keep the load close to the ground.
Use the shortest boom possible.

28. Using two or more cranes to lift a load involves many hazards not normally encountered in single crane lifts.

Multi-crane lifts:

Since the load is not freely suspended, careful engineering studies must be made to ensure that the load carried by each machine is less than its rated capacity.
Make sure slings are arranged to divide the load as planned.
Review the lifting plan with operators, signalmen and other crew members before beginning the lift.
Carefully coordinate crane movements through every state of the lift.
Avoid boom side loading (see #16).

29. Leaving a machine unattended can be very dangerous. Before leaving his seat. The operator must take the following steps to prevent his machine from moving:

Lower the load or bucket to the ground. Lower the boom when necessary.
Set the swing brake or lock.
Set all drum pawls.
Set parking brakes.
Set propel brakes or locks on crawler machines.

30. All wire rope must be inspected daily to determine whether it should be replaced. See the inspection form in the Operator's Manual and contact wire rope manufacturers and their distributors for more information.

Wire rope should be replaced when any of the following conditions exist:

In running ropes, six broken wires in one lay or three broken wires in one strand in one lay.
Wearing of 1/3 the original diameter of the outside individual wires.
Reductions from nominal diameter of more than:
1/32 in. for diameters of 3/8 to $^{1}/_{2}$ in.
3/64 in. for diameters of 9/16 to $^{3}/_{4}$ in
1/16 in. for diameters of 7/8 to 1-1/8 in.
3/32 in. for diameters of 1-1/4 to 1-1/2 in.

In standing ropes, more than two broken wires in one lay in sections between end connections or more than one broken wire at an end connection.

Evidence of kinking, bird caging, crushing, cuts, abrasions, sharp bends, or any other damage that results in distortion of the rope structure.

Rust or corrosion.

Warning: Do not use your hand to guide wire rope on to drums.

31. Improper wire rope connections may fail under load. Wire rope end connections must be installed properly and inspected daily.

Wedge sockets should be installed so that the loaded side of the rope is in a straight line with the edge of the socket and not bent by the wedge. Prevent the rope end from slipping out of the wedge socket by attaching a short piece of rope to the rope end with two u-bolt clamps.

U-bolt clamps (clips) should be installed so that the u-bolt is on the unloaded side and the saddle is on the loaded side.

Checklist for Safe Crane Use

Part 1 - Location Where Lift Is To Be Made

1. Is the crane path and work zone identified and marked?

2. Is there safe access for the crane and room to erect and raise the boom?

3. Are there power lines that the crane could reach? What is the required clearance distance? What control measures are in place? (Goal Posts and flags available in warehouse)

4. Are there trees, buildings, or other obstructions that must be avoided?

5. Does the location call for blind lifts requiring a communication system?

6. Is there adequate safe working and ground space for the riggers and others? for the outriggers, etc.?

7. Are the ground conditions adequate to support the crane, is matting required, and are blocks available for the outriggers?

8. Is the ground level, or is fill, cribbing, or mats necessary?

9. What are the anticipated weather conditions? Have lightning, high winds, rain, snow or ice been in the forecast?

10. Will the operator or signalmen have to look into the sun?

11. Does the lift have to be made at night? What lighting needs to be provided; and is it glare-free?

12. Will the work location be next to water - on embankments, docks, bridges, or a barge, which require special water safety provisions consistent with U.S. Coast Guard requirements, such as life preservers, emergency boats, etc.?

13. Has safe access been provided for bringing the loads to the site?

14. Does the load have to be lifted over buildings where people may be inside or other high-risk locations?

15. Can the crane be isolated from pedestrian and vehicular traffic? Will there be a pinch point between the counterweight and a stationary object or building? If so, are barricades available?

16. In the event an emergency occurs, is there a place where the load can be lowered or dropped off if the crane starts to tip or fall?

17. Will a pinch point be created between the rotating crane cab/counterweight and buildings, walls, poles, or other fixed objects? If so, what barricades or warnings will be provided?

Part 2 - The Load to Be Lifted

1. How heavy is the load, and will it require a special crane or multiple cranes?

2. How will the weight of the load be verified, as shipping weights are often erroneous?

3. What are the physical dimensions and the shape of the load?

4. Where is the center of gravity of the load? Can it change?

5. Does it have lifting lugs? Is the positioning of straps, cables or chains specified or discretionary?

6. Is a lifting beam, spreader bar, or other special rigging required?

7. Is the load symmetrical or nonsymmetrical? What type of rigging is required?

8. From what position will the load have to be lifted?

9. Does the load have to be rotated or have a change of axis in the lift?

10. What will be the final resting position of the load?

11. How many times does the lift have to be made?

12. Have any time limits been established for completing the lift or lifts?

13. Is the lift going to be complicated or critical and require computer-assisted analysis (CAD)?

14. Will the load be freely suspended at all times? A vibratory pile driver and puller is not a freely suspended load and should not be used without the crane manufacturer's authorization.

Part 3 - The Crane

1. When was the crane last inspected, load-tested and certified by a competent person? Will it need to be re-evaluated?

2. Is the crane of adequate capacity? Will it be well within its rated capacity at the most critical point of the lift? Is the tipping loading uniform for the 360 degrees of the rotations? If not, does the literature provide adequate information?

3. Is it equipped with functional:
a. Load-movement device or load indicator?
b. Anti-two-blocking device on both the main hoist line and jib?
c. Power lowering?
d. Safety latches on the hooks?
e. Spirit level?
f. Boom-angle indicator?
g. Or, on latticework booms, with boom stops or snubs and a boom-hoist limit switch?
h. Insulated link?
i. Proximity alarm?
j. Backup or travel alarm to warn of movement?
k. Mirrors or closed-circuit video with a view to the rear?

4. Does the crane have a dangerously close pinch point (14 inch or less) between the rotating cab, counterweight and the carrier frame or crawler treads? If so, what barricades or warnings need to be provided?

5. Will the crane need to be assembled and disassembled? Are instructions available and adequate? Is the operator's manual in the cab as required?

6. Is the competent/qualified person identified to direct the assembly/disassembly of the crane?

7. Does the crane have a lattice boom? Is blocking available to support the boom while it is assembled or disassembled?

Part 4 - Personnel

1. Who inspected the crane?

2. Who will be in charge of the lifting activity? Is he/she qualified for this duty? What makes him/her qualified?

3. Who is the crane operator? Is he/she qualified for this assignment? What are his/her qualifications? Is he/she physically and mentally capable of operating a crane at this time and place? Is the crane operator CCO certified?

4. Is the lifting crew experienced? Has a plan been developed and reviewed with everyone? Is any additional training required before beginning work?

Powder Actuated Tool Safety

Your safety and the safety of those around you should always be kept in the foremost thought in the mind of every powder actuated tool operator. Consider that the least powerful load used in powder actuated drivers produce approximately 10 times the powder of a .22 caliber long rifle cartridge. Respect this powder as you would your chain saw, your lawn mower, or your rifle.

NOTE: Only those who have training certification may operate powder actuated tools.

SAFETY WARNINGS

A. Handling the powder actuated tool

1. Never leave a powder actuated tool unattended. Once the tool is loaded, make the fastening or unload the tool.
2. Never carry powder load in the same pocket or container with fasteners or any other hard object.
3. Never use powder actuated power loads in firearms. They are more powerful than normal small arms ammunition.
4. Never carry a loaded tool from Job to job.
5. When working on scaffolds or ladders, maintain good balance and properly brace yourself at all times.
6. Always wear eye, ear, and head protection. Use the fool for its intended purpose only.

B. Operating Problems

1. If the powder load does not fire after pulling the trigger, hold the tool firmly against the work surface for at least 30 seconds. Carefully remove the tool from the work surface, making sure to point it away from yourself and any bystanders. Remove the load and dispose of it in a can of water. Unfired loads must never be thrown away in trash containers or carelessly discarded in any way.
2. Never attempt to force or pry an unfired powder load from the breech plug with a sharp or pointed object, as this may cause an accidental discharge.
3. Never attempt to disassemble a jammed tool containing a live powder load. Tag the tool “DO NOT USE” and store it safely in a locked carry case. Call the Safety Director. If, at any time during the operation of the tool, you feel it is not properly working, stop using it and call the Safety Director.

C. Safety Checklist

1. If necessary, bystanders in the area must be told toleave; warn all others that you are using powder actuated tool.
2. Check the work surface to be sure it is clear of any debris. Clear away debris completely so the tool will sit flush to the work surface.
3. Check the work area for explosive or flammable materials. If any are found, remove them, or do not operate the tool.
4. Check work surface to be fastened. If you are not sure, perform a center punch test before using the tool.
5. Check the breech faces of the tool to be sure there is no dirt, grit or foreign objects present.
6. Check the barrel to be sure you do not double load it, and that it is clear of any obstructions.
7. Before loading the tool, operate it a few times on a solid surface, making certain that the firing pin clicks when the tool is fully depressed, and the trigger is pulled.

Respirator Program

1.0 Purpose

Conewago has determined that employees assigned to the following routine construction operations may find themselves exposed to respiratory hazard.

Concrete Grinding	- Silica
Welding	- Toxic Fumes
Sand Blasting	- Silica/Particles
Core Drilling	- Silica
Spray Painting	- Toxic Fumes
Steel Fabrication	- Toxic Fumes
Mechanical	- Metal Particles

In some cases, these activities may represent immediate danger to life or health conditions (IDLH).

Engineering controls, such as ventilation, vacuum systems, wet grinding and substituting fewer toxic materials are the first line of defense.

However, engineering controls have not always been feasible for some of our operations or have not always controlled the identified hazards. In these situations, respirators and other protective equipment must be used. The processes requiring respirator use at Conewago are outlined in Table 1 of the Scope and Application section of this program.

If any employee expresses a desire to wear a respirator during certain operations that do not require respiratory protection, Conewago will accommodate the employee providing that will not jeopardize the health or safety of the workers. As outlined in the scope and application section of this program, voluntary respirator use is subject to certain requirements of this program.

2.0 Scope and Application

This program applies to all employees who are required to wear respirators during normal work operations and during some non-routine or emergency operations such as a spill of a hazardous substance.

All employees working in the areas outlined in Table 1 must be enrolled in the company's respiratory protection program if the daily operations they perform exceed permissible exposure levels.

In addition, any employee who voluntarily wears a respirator when a respirator is not required is subject to medical evaluation, cleaning, maintenance and storage elements of this program and must be provided with certain information specified in this section of the program. (Note: Employees who voluntarily wear filtering face pieces (dust masks) are not subject to the medical evaluation, cleaning, storage, and maintenance provisions of this program.)

Employees participating in the respiratory protection program do so at no cost to them. The expense associated with training, medical evaluations and respiratory protection equipment will be the responsibility of Conewago.

3.0 Responsibilities

The Program Administrator is responsible for administering the respiratory protection program. Duties of the Program Administrator include:

- Identifying work areas, processes or tasks that require workers to wear respirators, and evaluating hazards
- Selection of respiratory protection options
- Monitoring respirator use to ensure that respirators are used in accordance with their certifications
- Arranging for and/or conducting training
- Ensuring proper storage and maintenance of respiratory protection equipment
- Conducting qualitative fit testing
- Administering the medical surveillance program
- Maintaining records required of the program
- Evaluating the program
- Updating the written program as needed

The Program Administrator for Conewago is the Safety Director.

Supervisors/Foremen

Supervisors are responsible for ensuring that the respiratory program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors must ensure that the program is understood and followed by the employees under their supervision.

Duties of the Supervisor include:

- Ensuring that employees under their supervision (including new hires) have received appropriate training, fit testing, and annual medical evaluation.
- Ensuring the availability of appropriate respirators and accessories.
- Being aware of the tasks requiring respiratory protections.
- Enforcing the proper use of respiratory protection when necessary.
- Ensure that respirators fit well and do not cause discomfort.
- Ensure respirators that have not been individually issued, are properly cleaned, maintained, and stored according to the respiratory protection plan. Continually monitoring work areas and operations to identify respiratory hazards.
- Coordinating with the Program Administrator on how to address respiratory hazards or other concerns regarding the program.

Employees

Each employee has the responsibility to wear his or her respirator when and where required and in the manner in which they were trained. Employees must also:

- Care for and maintain their respirators as instructed and store them in a clean sanitary location.
- Inform their supervisor if the respirator no longer fits well and request a new one that fits properly.
- Inform their supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program.

4.0 Program Elements

The Program Administrator will select respirators to be used on site, based on the hazards to which workers are exposed and in accordance with all OSHA standards. The Program Administrator will conduct a hazard evaluation for each operation, process, or work area where airborne contaminants may be present in routine operations or during an emergency. The hazard evaluation will include:

- Identification and development of a list of hazardous substances used in the workplace.
- Review of work processes to determine where potential exposures to these hazardous substances may occur. This review shall be conducted by surveying the workplace, reviewing process records, and talking with employees and supervisors.
- Exposure monitoring to quantify potential hazardous exposures. Monitoring will be contracted out.

The results of the current hazard evaluation will be provided in a supplement to this program.

Updating the Hazard Assessment

The Program Administrator must revise and update the hazard assessment as needed. If an employee feels that respiratory protection is needed, he or she is to contact his or her supervisor or the Program Administrator. The Program Administrator will evaluate the potential hazard, arranging for outside assistance as necessary. The Program Administrator will then communicate the results back to the employee. If it is determined that respiratory protection is necessary, all other elements of this program will be in effect for those tasks and this program will be updated accordingly.

NIOSH Certification

All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval level. The label must not be removed or defaced while it is in use.

Voluntary Respirator Use

Conditions for voluntary use of respiratory protection:

1. Permission will be based on a case-by-case basis

2. Written request by employee

3. Workplace exposure levels below PELs, yet workers have a personal concern for their safety.

4. Workers receive medical clearance where required.

The Program Administrator will provide all employees who voluntarily choose to wear a respirator with a copy of appendix D of the standard.

Employees choosing to wear APR respirators (other than filtering face pieces) must comply with the procedures for medical evaluation, respirator use, and cleaning, maintenance and storage.

Medical Evaluation

Employees who are either required to wear respirators or who choose to wear an APR voluntarily, must pass a medical exam before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators until a physician has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

A licensed physician at OMY, Inc. will provide the medical evaluations. Medical evaluation procedures are as follows:

- A medical evaluation will be conducted using the questionnaire provided by OMY, Inc. This questionnaire adheres to the OSHA respiratory protection standard. The Program Administrator will provide a copy of this questionnaire to all employees requiring medical evaluations.
- A copy of the questionnaire will be provided to the employee in advance of the date of the medical evaluation in order that anyone who is unable to read and complete the questionnaire will be able to seek assistance.
- Employees will personally deliver the questionnaire to OMY employees at the time of their medical evaluation.
- Follow up medical exams will be granted to employees as required by the standard and/or as deemed necessary by the OMY, Inc. physician.
- All employees will be granted the opportunity to speak with the physician, if they so request.
- OMY, Inc. will be provided with a copy of this program, a copy of the Respiratory Protection Standards and a list of potentially hazardous work-related exposure scenarios for each employee requiring evaluation. That information will include:

    1. Work description

    2. Proposed respirator type and weight

    3. Expected physical workload (light, moderate, or heavy)

    4. Potential humidity and temperature extremes

5. Any additional protective clothing required

- After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided under the following circumstances:

    1. Employee reports sign and/or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.

    2. The OMY, Inc. physician or supervisor informs the Program Administrator that the employee needs to be reevaluated.

    3. Information from this program, including observations made during fit testing and program evaluation indicates a need for reevaluation.

    4. A change occurs in workplace conditions that may result in an increased physiological burden on the employee.

Note: A list of Conewago employees currently included in medical surveillance has been included in a supplement to this program. The supplement will be revised as personnel are added and removed from the program.

All examinations and questionnaires are to remain confidential between the employee and the physician.

Fit Testing

Fit testing is required for employees wearing half or full-face piece respirators.

Employees who are required to wear half or full-face piece respirators will be fit tested:

- Prior to wearing said respirator
- Annually
- When there are changes in the employee's physical condition that could offset respiratory fit (e.g., obvious change in body weight, facial scarring, etc.)

Employees will be fit tested with the make, model and size of respirator that they will actually wear. Employees will be provided with several models and sizes of respirators so that they may find an optimal fit.

The Program Administrator will conduct tests following the OSHA approved Saccharin Solution QLFT Protocol in Appendix B (B3) of the Respiratory Protection Standard.

The Program Administrator has determined that QNFT is not required for the respirators used under current conditions at Conewago. If conditions affecting respirator use change, the Program Administrator will evaluate on a case-by-case basis whether QNFT is required.

General Use Procedures

- Employees will use their respirators under conditions specified by this program, and in accordance with the training they receive on the use of each particular model. In

addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or by its manufacturer.

- All employees shall conduct user seal checks each time they wear their respirator. Employees shall use either the positive or negative pressure check (depending on which test works best for them) specified in Appendix B-1 of the Respiratory Protection Standard.

All employees shall be permitted to leave the immediate work area to maintain their respirator for the following reasons:

- To clean their respirator if the respirator is impeding their ability to work, change filters or cartridges, replace parts, or to inspect the respirator if it stops functioning as intended. Employees should notify their supervisor before leaving the area.

- Employees are not permitted to wear tight fitting respirators if they have any conditions, such as facial scars, facial hair, or missing dentures that prevents them from achieving a good seal.

Emergency Procedures

To be completed based on a site-by-site assessment.

Respirator Malfunction

1. APR Respirator Malfunction

   For any malfunction of an APR (e.g., such as breakthrough, face piece leakage, or improperly working valve), the respirator wearer should inform his or her supervisor that the respirator no longer functions as intended and proceed to a safe area to maintain the respirator. The supervisor must ensure that the employee receives the needed parts to repair the respirator or is provided with a new respirator.

2. Atmosphere Supplying Respirator Malfunction

   At any time, an atmosphere-supplying respirator shows any signs of a malfunction during sand blasting operations all work activities will cease. The worker will retreat to a safe area and report the malfunction to his or her supervisor so corrective measures can be taken.

IDLH Procedures

No employee shall enter any space where IDLH conditions exist. (This does not preclude confined space entry where atmospheric conditions have been tested and found to be within safe levels and continual monitoring and confined space procedures are being followed.)

Air Quality for Supplied Air Respirators

Compressed breathing air must meet the requirement for Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air.

Compressed breathing air provided by compressors must be located so that the air intake component is not drawing from areas that contain:

- Combustion exhaust from vehicles or the compressor itself.
- Contaminated air from hazardous work areas surrounding the compressor.

Suitable air purifying beds and filters must be used in the supply lines to ensure delivery of a continuous flow of Grade D breathing air to the respirator user.

A tag must be maintained at/on the compressor with a note indicating when the filter was last changed. Only a tag indicating the most recent filter changes needs to be retained at/on the compressor.

Cleaning, Maintenance, Change Schedules and Storage

Cleaning

- Respirators are to be regularly cleaned and disinfected.
- Respirators issued for the exclusive use of an employee shall be cleaned as often as necessary.
- Atmosphere supplying and emergency use respirators are to be cleaned and disinfected after each use.

The following procedure is to be used when cleaning and disinfecting respirators:

- Disassemble respirator, removing any filters, canisters, or cartridges.
- Wash the face piece and associated parts in a mild detergent with warm water. Do not use organic solvents.
- Rinse completely in clean warm water.
- Wipe the respirator with disinfectant wipes to kill germs.
- Air dry in a clean area.
- Reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other tight container.

Note: The stockroom will ensure adequate supplies of appropriate cleaning and disinfection material are available. If supplies are low, employees should contact their supervisor or the Program Administrator.

Maintenance

Respirators are to be properly maintained at all times in order to ensure that they function properly and adequately protect the employee. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use. No components will be replaced or repairs made beyond those recommended by the manufacturer. The manufacturer will conduct repairs to regulators or alarms of atmosphere - supplying respirators.

The following checklist will be used when inspecting respirators:

- Face Piece - Cracks, tears, holes, facemask distortion, cracked or loose lenses/face shields
- Head Straps - Breaks or tears, broken buckles
- Filters/Cartridges - Approval designation, gaskets, cracks or dents in housing, proper cartridge for hazard
- Air Supply Systems - Breathing air quality/grade condition of supply hoses, hose connections, settings or regulators and valves

Employees are permitted to leave their work area to perform limited maintenance on their respirator in an area that is free of respiratory hazards. Situations when this is permitted include to wash their face and respirator face piece to prevent any eye or skin irritation, to replace the filter, cartridge, or canister, and if they detect vapor or gas breakthrough or leakage in the face piece or if they detect any other damage to the respirator or its components.

Change Schedules

Employees wearing APRs or PAPRs with filtering protection shall change the cartridges on their respirator when they first begin to experience difficulty breathing (i.e. resistance) while wearing their masks.

Storage

Respirators must be stored in a clean, dry area, and in accordance with the manufacturer's recommendations. Each employee will clean and inspect their own air purifying respirator in accordance with the provisions of this program and will store their respirator in a plastic bag. Each employee will have his or her name on the bag and that bag will only be used to store the employee's respirator. Employees are responsible for making sure their respirator is accessible and in working order at all times.

Atmosphere supplying respirators will be maintained and stored by the department to which it has been assigned. It is the department supervisor's responsibility to store and maintain atmosphere - supplying respirators to manufacturer's specifications.

The Program Administrator will consult with the equipment supply supervisor to ensure all stored respirator equipment is maintained properly and stored in the original manufacture's container whenever possible.

Defective Respirators

Respirators that are defective or have defective parts shall be taken out of service immediately. If, during air inspection, an employee discovers a defect in a respirator, he or she is to bring the defect to the attention of his or her supervisor. Supervisors will give the defective respirators to the Program Administrator. The Program Administrator will decide whether to:

- Temporarily take the respirator out of service until it can be repaired

- Perform a simple fix on the spot such as replacing a head strap
- Dispose of the respirator due to an irreparable problem or defect

When a respirator is taken out of service for an extended period of time, the respirator will be tagged out of service and the employee will be given a replacement of similar make, model, and size. All tagged out respirators will be turned over to the stock room supervisor or Program Administrator.

Training

The Program Administrator will provide training to respirator users. Supervisors must be familiar with this program and the OSHA Respiratory Protection Standard.

Workers will be trained prior to using a respirator in the workplace. Supervisors will also be trained prior to using a respirator in the workplace or prior to supervising employees that must wear respirators.

The training course will cover the following topics:

- The Conewago Respiratory Protection Program

- The OSHA Respiratory Protection Standard
- Respiratory hazards encountered at Conewago and their health effects
- Proper selection and use of respirators
- Limitations of respirators
- Respirator donning and user seal (fit checks)
- Maintenance and storage
- Emergency use procedures
- Medical signs and symptoms limiting the effectiveness of respirators

Employees will be retrained annually or as needed. Employees must demonstrate their understanding of the topics covered in the training through hands on training and a written test. The Program Administrator will document respirator training and the documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested.

5.0 Program Evaluation

The Program Administrator will conduct periodic evaluations of the workplace to ensure the provisions of this program are being implemented. The evaluations will include regular evaluations with employees who use respirators and their supervisors, site inspections, air monitoring and a review of records.
Problems identified will be noted on the written site safety report and written documentation completed that explains how any deficiencies where corrected.

6.0 Record Keeping

A written copy of this program and the OSHA standard is kept in the Program Administrators office and is available to all employees who wish to review it.

Also maintained in the Program Administrator's office are copies of training and fit test records. These records will be updated as new employees are trained, as existing employees receive refresher training, and as new fit tests are conducted.

The Program Administrator will also maintain copies of the medical records for all employees covered under the respirator program.

The completed medical questionnaire and the physicians documented findings are confidential and will remain at OMY, Inc. The company will only retain the physician’s written recommendation regarding each employee's ability to wear a respirator.

7.0 Dust, Fumes, and Smoke

In the event Conewago employees are exposed to dust, fumes, or smoke from the operations of another prime or general contractor, the Conewago competent person will cease all operations until the problem has been corrected.

SANDBLASTING OPERATION AND SAFETY

PURPOSE: This company program establishes requirements for safe operation and maintenance procedures while working around our sandblasting station.

SCOPE: These procedures apply to all situations involving a possibility of human endangerment while working around the sandblasting unit.

AFFECTED EMPLOYEES:
All those working in or around our sandblasting operation performing such tasks as adjusting, cleaning, inspecting, operating and maintaining equipment.

FOREMEN

1. Ensure that all employees involved in sandblasting procedures are properly instructed.
2. Ensure that all employees involved in sandblasting procedures follow the guidelines in this program.
3. Conduct random inspections on a periodic basis to verify that proper sandblasting procedures are being followed.

SANDBLASTING PROCEDURES

1. Make sure sandblasting area is clear of all other personnel.
2. Perform steps 1-5 of the daily service checklist
3. Turn air supply line on; let unit run for 5 minutes to clear lines of condensation and stale air.
4. Fill sand pot and turn on dust-collection system.
5. Put on the following personal protective equipment; air hood, long-sleeved shirt, welding gloves, and ear plugs.
6. Proceed with sandblasting.

PROTECTIVE EQUIPMENT

The following personal protective equipment must be worn at all times while blasting:

1. Air-fed sandblast hood
2. Welding gloves
3. Long-sleeved shirt
4. Long pants
5. Ear plugs
6. Steel-tipped above-the-ankle safety footwear

DAILY SERVICE CHECKLIST

1. Check all hoses for wear or defects.
2. Check the air hood, replace the tear-away lenses, and inspect collar and cape.
3. Check the air flow in the hood.

4. Check the air pressure at the free air pump (between each pot of sand).
5. Check all connections on the sandblast pot.

WEEKLY SERVICE CHECKLIST

1. Check and clean air filters on the free air pump.
2. Clean the air hood and cape.
3. Check filters and air hose on the dust collectors.
4. Refer to the operation manual for the air flow requirements.
5. Use proper lock-out/tag-out procedures when performing maintenance on the sandblast unit.

NOTE: No one shall enter the sandblast area while the unit is in operation, except the sandblaster using the proper personal protective equipment.

Written Silica Exposure Control Program

Applicability

This Written Exposure Control Plan (Plan) applies to **Conewago** personnel who are potentially exposed to airborne concentrations of respirable crystalline silica (silica) because of their work activities or proximity to the work locations where airborne silica is being emitted. This Plan also applies to **Conewago** superintendents, foremen, or safety personnel who may be responsible for overseeing a subcontractor's operations that have the potential to expose personnel to airborne concentrations of silica at or above regulatory and industry action levels and exposure limits.

Scope

This Plan describes the hazards associated with projects involving potential exposure to airborne concentrations of silica and the issues to be addressed during these projects. These projects include, but are not limited to:

- Use of stationary masonry saws used to cut concrete, tile, concrete masonry block, sheet rock, gypsum fiber roof board, or any other product containing quartz.
- Handheld power saws used to cut concrete, asphalt, concrete masonry block, sheet rock, gypsum fiber roof board, or any other product containing quartz.
- Walk-behind saws used to cut concrete or asphalt.
- Rig-mounted or free standing core saws or drills (including impact and rotary hammer drills) used to penetrate concrete, concrete masonry block, sheet rock, gypsum fiber roof board, or any other structural component or product containing quartz.
- Jackhammers and handheld powered chipping tools used to demolish or modify concrete, concrete masonry block, or any other structural component or product containing quartz.
- Vehicle mounted hammers or chipping tools used to demolish concrete, concrete masonry block, or any other structural component or product containing quartz.
- Handheld grinders or cut-off wheels used for mortar removal or cutting/grinding of concrete, concrete masonry block, sheet rock, gypsum fiber roof board, or any other structural component or product containing quartz.
- Walk-behind milling machines or bead blasters used for surfacing activities on concrete, concrete masonry block, asphalt, or any other product containing quartz.
- Installation or demolition of sheet rock, including mudding, taping, texturizing activities with quartz containing materials.
- Hand or power tool sanding of painted surfaces. Current latex paint products contain quartz and the painted substrate (sheet rock, concrete masonry block, concrete) contains quartz.
- Ball mills or crushing equipment used to size products containing quartz.
- All housekeeping operations associated with the activities described above.

Conewago employees who work in proximity to silica-related operations must be aware of safe work practices and take all necessary precautions associated with avoiding and minimizing airborne silica exposure.

Regulatory Review

Occupational Safety and Health Administration (OSHA) 29 CFR 1926.1153: Respirable Crystalline Silica (Construction Industry) and 29 CFR 1910.1053: Respirable Crystalline Silica (General Industry), contain regulatory requirements specific to respirable crystalline silica. This

Written Exposure Control Plan is developed in accordance with the requirements in 29 CFR 1926.1153(g).

Project Planning

Training Requirements

Conewago employees who anticipate working on projects where they could be exposed to airborne silica will be provided training in silica hazards in accordance the **Conewago** program established to comply with the hazard communication standard (29 CFR 1910.1200). Each employee will have access to labels on containers of crystalline silica and safety data sheets, and be provided information on the health hazards of silica including cancer, lung effects, immune system effects, and kidney effects. In addition, **Conewago** employees will be provided training and information regarding specific activities identified in this Plan that could result in airborne silica exposure, and the specific engineering controls, work practices and respiratory protection requirements to mitigate the potential airborne silica exposures. This training will provide a discussion of silica hazards, initial exposure determination either by complying with 29 CFR 1926.1153 Table 1 requirements or air monitoring, specific engineering and work practice control measures, personal protective equipment (PPE), and medical surveillance requirements. The training will also identify the **Conewago** competent person for silica exposure identification and determination of control requirements. All **Conewago** employees will be provided with access to a copy of 29 CFR 1910.1153 and be trained on the contents of 29 CFR 1926.1153.

Medical Surveillance Requirements

Conewago shall institute medical surveillance for any employees required by this Plan to wear a respirator 30 or more days per year. Initial medical surveillance consists of medical and work history with emphasis on: past, present, and anticipated exposure to silica, dust and other agents affecting the respiratory system; any history of respiratory system dysfunction, including signs and symptoms of respiratory disease (e.g., shortness of breath, cough, wheezing); history of tuberculosis; and smoking status and history; a physical examination with emphasis on the respiratory system; chest X-ray (a single posterio-anterior radiographic projection or radiograph of the chest at full inspiration recorded on either film (no less than 14 x 17 inches and no more than 16 x 17 inches) or digital radiography systems), interpreted and classified according to the International Labor Office (ILO) International Classification of Radiographs of Pneumoconiosis by a NIOSH-certified B Reader; a pulmonary function test to include forced vital capacity (FVC) and forced expiratory volume in one second (FEV1) and FEV1/FVC ratio, administered by a spirometry technician with a current certificate from a NIOSH approved spirometry course; testing for latent tuberculosis infection; and any other tests deemed appropriate by the Occupational Medicine Provider. Subcontractors are responsible for implementing a medical surveillance program for their employees.

Competent Person Requirements

Conewago shall identify a competent person to inspect and oversee all activities with potential airborne silica exposure. Subcontractors working on projects within the scope of this Program shall appoint a competent person capable of executing the duties described herein. The competent person must have training in the inspection of work areas and equipment and in the determination of safe working conditions. This person shall have a working knowledge of the 1926.1153 standards, shall be capable of identifying airborne silica hazards, shall determine the need for initial and additional exposure monitoring, shall recommend and implement engineering and work practice controls, shall establish levels of PPE, and shall have the authority to take action to eliminate hazards and correct incidences of noncompliance.

Planning Activities

Projects where anticipated activities involve concrete cutting, grinding, sandblasting, drilling, coring, or other abrasive operations are treated as potential sources for airborne silica exposure. Additionally, existing structures and materials such as sheetrock, any painted surfaces with low volatile organic compounds, tile, brick, or some insulation products may contain silica. Likewise, new material installation may involve silica-containing mortar, paints, or insulation. Where process knowledge indicates the presence of silica, **Conewago** will either implement all controls required by 1926.1153 Table 1-

Exposure Control Methods for Selected Construction Operations or conduct an initial determination in accordance with 29 CFR 1926.1153(d)(2).

Project Execution

Safe Work Practices

The requirements of this section are to be followed by **Conewago** employees, who may be exposed to airborne concentrations of silica at or above the regulatory limits.

Exposure Assessment

Conewago will either comply with and implement all controls required by 1926.1153 Table 1- Exposure Control Methods for Selected Construction Operations **or** conduct an initial determination in accordance with 29 CFR 1926.1153(d)(2). Conewago has identified certain construction tasks with exposure to silica dust. While most tasks are on Table 1, there are others not on Table 1. For these tasks, Conewago has done air sampling as part of our exposure assessment, to determine whether the exposure to our employees reaches or exceeds the PEL or action level as established by OSHA. An exposure control chart has been created specifically for these tasks and contains Conewago procedures to control or eliminate the silica exposure to our employees. This chart is a "living document" and will be updated as new testing results, equipment, and/or housekeeping measures become available.

- An exposure assessment is required when employees may be exposed to airborne silica at or above the action level in order to determine the extent to which employees are exposed and the appropriate exposure controls required.
- An initial determination of exposure shall be made at the beginning of operations. The determination shall consist of the collection of personal air samples representative of a full shift including at least one sample for each job classification in each work area, either for each shift, or for the shift with the highest exposure level.
- During the initial determination, until such time that actual airborne concentrations are determined, personnel shall be protected by respiratory protection based on task- specific anticipated airborne concentrations of silica.
- During the initial determination, and in addition to the levels of respiratory protection required, personnel shall be provided with protective clothing and equipment, hygiene facilities, and training.
- Whenever a change in equipment, process, controls, or personnel occurs, or a new task has been initiated, an additional exposure assessment is required.
- When an assessment determines that exposure has occurred above the action level but below the PEL, additional monitoring shall be required at least every 6 months.

Additional monitoring shall continue until such time that the monitoring results fall below the action level on two separate occasions at least 7 days apart.

- When monitoring yields results above the PEL, then quarterly monitoring is required. In addition, the quarterly monitoring may be suspended when additional monitoring results fall below the action level on two separate occasions at least 7 days apart.
- Where the competent person can clearly demonstrate, in the absence of air monitoring data, that a work activity will not create airborne silica concentrations in excess of the action level, then air monitoring may be unwarranted. Where a negative initial determination is reached without air monitoring, the competent person must develop a written explanation as to why exposures are not expected to exceed the action level.

Communication of Hazards

- Each employee shall be provided training and be able to demonstrate knowledge and understanding of the following:
    - Health hazards associated with exposure to respirable crystalline silica
    - Specific tasks that could result in exposure to respirable crystalline silica
    - Specific measures that are required to protect employees from exposure to respirable crystalline silica, including engineering controls, work practices, and required use of respiratory protection
    - The contents of the 29 CFR 1926.1153
    - The identity of the competent person
    - Purpose and description of the medical surveillance program
- A written compliance program shall be made available to all affected employees.
- In addition, notification to owners, contractors, and other personnel working in the area shall be made.

Control Methods

- Engineering and work practice controls, including administrative controls, shall be implemented to reduce and maintain employee exposure to silica at or below the PEL, to the extent that such controls are feasible.
- Where all feasible engineering and work practice controls that can be instituted are not sufficient to reduce employee exposure to or below the PEL, such controls shall be used, nonetheless, to reduce employee exposure to the lowest feasible level (and in conjunction with respiratory protection).
- Respiratory protection shall be selected based on guidance in 1926.1153 Table 1 or based on a Certified Industrial Hygienist's or competent person's assessment of the potential airborne exposure that may be created by the means and methods of work (high energy operations with high airborne dust generation or low energy operations with low dust generation).
- When using mechanical ventilation to control exposure, regularly evaluate the system's ability to effectively control exposure.

- If administrative controls are used to limit exposure, establish and implement a job rotation schedule that includes employee identification as well as the duration and exposure levels at each job or work station where each affected employee is located.
- A written compliance program shall be established and implemented prior to the start of operations within the scope of this Written Compliance Plan. The written program shall outline the plans for maintaining employee exposure below the PEL.
- Maintain all surfaces as free as possible from accumulations of silica. Select methods for cleaning surfaces and floors that minimize the likelihood of silica becoming airborne (such as using a HEPA vacuum).
- If vacuuming is the method selected, specialized vacuums with HEPA filtration are required. Methods to use and empty vacuums in a manner that minimizes the reentry of silica into the workplace shall be described and used. Use of household vacuums with HEPA filters are not allowed at any time for the collection of dust or debris that contains silica.
- Never use compressed air to remove silica from any surface unless it is used in conjunction with a ventilation system designed to capture the airborne dust created while using the compressed air.
- Employees shall not eat, drink, smoke, chew tobacco or gum, or apply cosmetics in any areas where exposure to silica is above the PEL (in other words, regulated areas).
- Do not allow employees to leave the workplace wearing any protective clothing or equipment that is required to be worn during their work shift without HEPA vacuum removal of dust.
- Where feasible, install shower facilities and require employees who work in regulated areas to shower at the end of their work shift. Also provide an adequate supply of cleaning agents and clean towels.
- Provide hand washing facilities for use by employees working in regulated areas. Furthermore, require employees to wash their hands and face at the end of the work shift and prior to eating or entering eating facilities, drinking, smoking, or applying cosmetics.
- Eating facilities or areas shall be provided for employees working in regulated areas. These facilities shall be maintained free of silica contamination and shall be readily accessible to those employees.

Personal Protective Equipment (PPE)

Respiratory protection must be used for the following conditions:

- During periods when employee exposure to airborne silica exceeds the PEL
- For work operations where engineering and work-practice controls are not sufficient to reduce employee exposure to or below the PEL
- During periods when an employee requests a respirator
- During periods when respirators are required to provide interim protection while conducting initial exposure assessments
- Employees shall be provided, at no cost, protective work clothing and equipment including cotton coveralls or similar full-body clothing, gloves, hats, shoes or disposable shoe coverlets, face shields, vented goggles, or other appropriate PPE.

Scaffold Safety

A: Prior to Erection of All Scaffolding Assemblies

Everyone's safety depends upon the design, erection use, and dismantling of **scaffolding by COMPETENT PERSONS ONLY.**

Inspect scaffolding before each use to see that the assembly has not been altered and is safe for use.

Manufacturers and Rental Dealers of Scaffolding issue detailed instructions concerning the erection, use and dismantling of Scaffolding Structures, follow these instructions closely.

As a minimum, observe the following guidelines when using scaffolding;

1. The erection site must be inspected to determine ground conditions, strength of supporting structure, and proximity of electric power lines, overhead obstructions, wind conditions, and the need for overhead or weather protection. These conditions must be evaluated and adequately addressed.

2. Frame spacing and sill size can only be determined after the total loads to be imposed on the scaffold and the weight of the scaffold have been calculated.

3. Stationary scaffolds over 125 feet in height must be designed by a professional engineer.

4. All equipment must be inspected to see that it is in good condition and is serviceable. Damaged or deteriorated equipment must not be used. Daile inspection tags are to be visible and legible.

   WARNING: Not all species and grades of lumber can be used as scaffold plank. Wood planks used for scaffolding must be graded as scaffold plank by an approved grading agency, or specifically manufactured for scaffold use.

5. Scaffold plank must be inspected to see that it is graded as scaffold plank, is sound and in good condition, and is free from saw cuts, cracks, notches, splits, delaminations and holes.

6. A fully qualified and competent person can deviate from these guidelines only if it can be shown that the resulting scaffold design complies with applicable codes and generally accepted scaffold engineering practices.

7. The scaffold assembly must be designed to comply with all OSHA, Local, State, and Federal requirements.

B. Erection of Scaffold.

Scaffold must be erected, moved, or disassembled only under the supervision of competent persons. Safety equipment including safety glasses and hard hats must be worn by all persons erecting, moving, dismantling or using scaffolding.

1. Base plates must be centered on the sills, and be in firm contact with both sills and frame legs. Be especially careful when scaffolds are to be erected on soft or frozen ground. Any part of a building or structure used to support the scaffolding must be capable of supporting the load to be applied.

2. Compensate for uneven ground by using screw jacks and base plates, and sills if required by ground conditions. DO NOT USE unstable objects such as blocks, loose bricks, and similar objects or materials.

3. Plumb and level scaffolding. Be sure scaffold stays plumb and level as erection progresses.

4. Ties, guys, bracing, and/or outriggers may be needed to assure a safe, stable scaffold assembly. The height of the scaffold in relation to the minimum base width, wind loads, the use of brackets or cantilevered platforms, and imposed scaffold loads determine the need for sway and stability bracing.

   The following general guidelines apply:

   a. A scaffold must always be secured when the height of the scaffold exceeds four (4) times the minimum base width.

   b. Ties must be placed as near as possible to horizontal members. The bottom tie must be placed no higher than four (4) times the minimum scaffold base width. Subsequent vertical tie placement will depend upon the scaffold width. Scaffolds three (3) feet and narrower must be tied at vertical intervals no more than 20 feet apart. Scaffolds wider than three (3) feet must be tied at vertical intervals no more than 26 feet apart. The uppermost tie should be placed as close to the top as possible and, in no case, more than four (4) times the minimum base width from the top.

   c. Vertical ties must be placed at the ends of the scaffold runs and at no more than 30 feet horizontal intervals in between.

   d. Ties must be installed as the erection progresses, and not removed until scaffold is dismantled to that height.

   e. Side brackets, cantilevered platforms, pulleys, hoist arms, enclosed scaffolds, sloped surfaces, and windy conditions introduce overturning and uplift forces which must be considered and compensated for. These situations require additional bracing, tying, or guying.

   f. Circular scaffold erected completely around or within a structure may be restrained from tipping by use of “stand-off” bracing members.

g. A free standing tower must be guyed at the intervals outlined above or otherwise restrained to prevent tipping or overturning.

5. Outrigger frames or outrigger units can be used to increase the minimum base width. If used, they must be installed on both sides of the tower.

6. Work platforms must be fully decked with platform units in good, sound condition. Platform units may be individual scaffold grade wood planks, fabricated planks, fabricated scaffold decks or fabricated scaffold platforms.

   a. Scaffold platforms and walkways must be at least 18 inches wide.

   b. Each end of each plank must overlap its support by a minimum of 6 inches or be cleated.

   c. Each end of each platform 10 feet long or less must overhang its supports by no more than 12 inches. Each end of each platform longer than 10 feet must overhang its supports by no more than 18 inches. Larger overhangs must be guarded to prevent access to the overhang.

   d. Materials must not be stored on overhangs. Do not stand on overhangs.

   e. Each plank on a continuous run scaffold must extend over its supports by at least 6 inches and overlap each other by at least 12 inches.

   f. Spans of 2 inch by 10 inch nominal scaffold grade plank must never exceed 10 feet. No more than one person must stand on an individual plank at one time. Loads on planks must be evenly distributed and not exceed the allowable loads for type of plank being used.

   g. Secure platform units to scaffolding to prevent uplift caused by high winds or other job site conditions. Use latches, if supplied by platform manufacturer or other suitable means.

7. Guardrails must be used on all open sides and ends of scaffold platforms. Both top and midrails are required. Local codes specify minimum heights where guardrails are required. Use at lower heights if falls can cause injury.

8. Toeboards must be installed whenever people are required to work or pass under a scaffold platform. When materials are to be stacked higher than the toeboard, screening is required from the toeboard or platform to the top guardrail.

9. Access must be provided to all work platforms. If access is not available from the structure, access ladder units, or stairways must be provided. When access ladder units are provided; a rest platform must be installed at vertical intervals of 35 feet or less. Attachable ladder units must extend at least three (3) feet above platforms. Install access ladder units as scaffold erection progresses.

10. Use fabricated decks or cleated planks to minimize platform interference in access areas.

11. DO NOT store materials on side or end bracket platforms.

12. Cantilevered platforms must be specifically designed for that purpose, the frames pinned to prevent uplift and adequate ties provided to prevent overturning.

13. Materials must never be placed on cantilevered platforms unless the assembly has been designed to support material loads by a qualified person. These types of platforms cause overturning and uplift forces which must be compensated for.

14. After erecting scaffold, be sure screw jacks are in firm contact with frame legs.

15. Special care must be taken when putlogs are used:

    a. Putlogs must only be mounted using putlog hangers, with all bolts and nuts installed and tightened.

    b. Putlogs must overhang their supports by at least 6 inches.

    c. Lateral bracing and knee bracing are both required for putlog spans greater than 10 feet.

    d. Putlogs used as side or end brackets require special mountings and special bracing.

16. DO NOT install platforms between free standing towers.

17. Material hoists and derricks should not be mounted on a scaffold unless the scaffold is specifically designed for that purpose.

18. CHECK THE ENTIRE SCAFFOLD ASSEMBLY BEFORE USE. Thoroughly inspect the completed assembly to see that it complies with all safety codes, all fasteners are in place and tightened, it is level and plumb, work platforms are fully decked, guardrails are in place, and safe access is provided.

C. Erection of Rolling Scaffolds

The following additional precautions apply to the erection of rolling towers:

1. The height of the rolling tower must not exceed four (4) times its minimum base width, or 40 feet, whichever is lower.

   WARNING: The load rating of the casters used will limit the size, configuration, and load capacity of the rolling tower.

2. Secure all casters to frame legs or screw jacks with a nut and bolt or other secure means.

3. Screw jacks must not increase the height of the scaffold by more than 12 inches. Towers must be kept level and plumb at all times.

4. Horizontal diagonal bracing must be used at the bottom and top of rolling towers where the top work platform is more than 9 feet above the surface.

5. When rolling towers are to be erected higher than 9 feet, the first brace must be no more than 2 feet above the casters, the others at no greater than 21 foot intervals above. Fabricated planks with hooks may be used as diagonal braces.

6. All frames must be fully cross-braced.

7. Platform units with hooks, or cleated planks, must be used on rolling towers.

D. Use of All Types of Scaffolds

1. Before you use the scaffold, you must have completed scaffold safety training and a competent person must:

   a. Inspect the scaffold assembly to be sure it has not been altered;

   b. is assembled correctly;

   c. is level and plumb;

   d. all base plates are in firm contact with sills;

   e. all bracing is in place and securely tightened

   f. all platforms are fully decked;

   g. all guardrails are in place;

   h. safe access is provided;

   i. it is properly tied and/or guyed;

   j. there are no overhead obstructions;

   k. there are no energized electric power lines within 12 feet of the scaffold assembly and;

   l. any deficiencies found are corrected prior to use.

2. Use only proper access. Do not climb cross braces. Do not climb any scaffold component unless it is specifically designed for that purpose. Do not stand on platform overhangs. Barricade area below to prevent unauthorized entry.

3. Climb safely!

   a. Face the rungs as you climb up or down.

   b. Use both hands.

   c. Do not try to carry materials while you climb.

d. Be sure of your footing and balance before you let go with your hands. Keep one hand firmly on frame or ladder at all times.

e. Clean shoes and rungs to avoid slipping.

4. DO NOT work on slippery platforms.

5. DO NOT overload platforms with materials. Special care must be taken when putlogs are used.

6. DO NOT store materials on platforms supported by putlogs. They are designed for personnel ONLY.

7. DO NOT extend working heights by standing on planked guardrails, boxes, ladders or other materials on scaffold platforms.

8. DO NOT loosen, detach, or remove any component of a scaffold assembly except under the supervision of a competent person. Components that have been removed must be replaced immediately.

9. DO NOT erect scaffolding on wagons, trucks, or other wheeled vehicles.

10. Stand only within the platform area; do not try to extend work area by leaning out over guard railing.

E. Additional Precautions When Using Rolling Towers

1. DO NOT RIDE MANUALLY PROPELLED ROLLING SCAFFOLD! NO ONE MUST BE ON A ROLLING TOWER WHILE IT IS BEING MOVED.

2. Lock all casters before getting on a rolling tower. Casters must be locked at all times the scaffold is not being moved.

3. DO NOT bridge between rolling towers.

4. Remove all materials from scaffolding before moving a rolling tower.

5. Be sure floor surface is clear of obstructions or holes before moving scaffold.

6. Be sure there are no overhead obstructions or energized electric power lines in the path when moving a rolling tower.

7. Rolling towers must only be used on level surfaces.

8. Move rolling towers from the base level only. DO NOT PULL OR PUSH from the top.

F. Dismantling Scaffolds

The following additional precautions apply when dismantling scaffolding:

1. PRIOR TO REMOVAL OR LOOSENING of any component, consider the effect the removal of the component, or the loosening of a joint, will have on the strength of the remaining assembly.

2. Check to see if scaffolding has been altered in any way which would make it unsafe. If so, reconstruct where necessary before beginning the dismantling process.

3. Use only proper access. Do not climb braces or vertical members. Do not climb scaffold components unless they are specifically designed for that purpose.

4. Do not remove ties until scaffold above has been removed.

5. Visually inspect each plank to be sure it is supported on both ends and is safe to work on.

6. Do not accumulate removed components or equipment on the scaffold.

7. Lower components in a safe manner as soon as dismantled. Do not throw components off scaffold.

8. Stockpile dismantled equipment in an orderly manner.

9. Remove scaffold components immediately after detaching from scaffold.

10. Understanding and following these safety guidelines will increase your personal safety and the safety of your fellow workers.

G.Training

All employees must be trained in scaffold safety and this policy before working on a scaffold. The contents of this policy must be reviewed before every scaffold is erected.

SPRAY PAINTING SAFETY

THE FOLLOWING ARE SOME COMMON SENSE GUIDELINES DESIGNED TO PROMOTE SAFETY IN PAINTING OPERATIONS:

1. Positive ventilation of the work areas should be secured by natural means or forced ventilation by exhaust fan.

2. Only approved explosion-proof electrical equipment should be used in spraying areas.

3. Smoking or any other source of ignition is strictly forbidden in or near the spraying area. This includes welding, burning, or the use of sparking tools.

4. Approved type respirators should be worn in the spraying area. Filters should be changed regularly.

5. Keep your work areas clean and clear. Dispose of trash and other combustible at once.

6. Put sweepings, waste, and oil- or paint-soaked in metal containers, wet them down and keep the covers closed. Dispose of daily.

7. Never clean the work area or equipment with flammable solvents.

8. Adjust the gun pressure so that it does not produce excessive mist. Cover exposed equipment, etc. with drop cloths.

9. No more than one day's supply of paint and solvents should be kept in the work area.

10. Use of metal ladders should be strictly forbidden.

11. Wood scaffolding should be erected only by those qualified to do so, and those that know the safety factors involved.

12. Do not attempt to repair or adjust any electrical equipment. Report such faulty equipment to the maintenance electrician.

13. Maintain clear working areas.

14. Follow good storage practices for tools, material, and equipment.

15. When using hoses, etc., locate them so they will not create a tripping hazard.

16. Wear personal protective equipment where required, such as respirators when spraying paint, safety goggles, when scarping, and abrasive air masks when sandblasting.

17. Never use compressed air for blowing dirt from hands, face or clothing, nor for cleaning equipment.

18. Keep fire extinguishers in the immediate work area at all times. Be sure of their operation.

19. Because of the toxicity of Carbon Tetrachloride (CC4), it should not be used for degreasing or cleaning on this operation.

Tools − Hand and Power

A. General Requirements

1. All hand and power tools and similar equipment shall be maintained in a safe condition.

2. When power operated tools are designated to accommodate guards, they shall be equipped with such guards when in use.

3. Sufficient forms of personal protective equipment shall be worn when necessary to protect one from hazards.

4. All tools must be inspected for damage, including damage to the cord and plug.

B. Hand Tools

1. The use of unsafe hand tools is strictly prohibited.

2. Wrenches, including adjustable, pipe, end, and socket wrenches shall not be used when jaws are sprung to the point that slippage occurs.

3. Wooden handles of tools shall be kept free of splinters or cracks and shall be kept tight in the tool.

4. The use of “cheater” bars is prohibited.

C. Power-Operated Hand Tools

1. Electric power operated tools shall either be of the approved double insulated type or grounded in accordance with OSHA regulations.

2. Pneumatic power tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.

3. Only those employees who possess a training certification may operate powder actuated tools. Verification of certification must be presented to the Conewago Site Superintendent prior to commencing operations involving powder actuated tools.

D. Abrasive Wheels and Tools

1. All grinding machines shall be supplied with sufficient power to maintain the spindle speed at safe levels under all conditions of normal operation.

2. Grinding machines shall be equipped with appropriate safety guards.

3. All abrasive wheels shall be closely inspected and ring-tested before mounting to ensure that they are free from cracks or defects. Wheels must meet the requirements of the grinding machine.

E. Woodworking Tools

1. All portable power-driven circular saws shall be equipped with guards above and below the base plate or shoe.

2. Guides and templates shall be utilized as much as possible to aid operator in safe operation.

3. All cutting with portable power-driven circular saws shall be on a flat surface that provides adequate friction to prevent movement of the material to be cut.

Welding and Cutting

These written Welding and Cutting Procedures establish guidelines to be followed whenever any of our employees work with welding and cutting equipment at this company. The procedures here establish uniform requirements designed to ensure that welding and cutting safety training, operation, and maintenance practices are communicated to and understood by affected employees. These requirements also are designed to ensure that procedures are in place to safeguard the health and safety of all employees.

It is our intent to comply with the requirements of 29 CFR 1926.350 through .354. These regulations have requirements for welding and cutting operations. We also comply with applicable requirements of:

ANSI Z49.1-1967	Safety in Welding and Cutting
CGA Pamphlet P-1-1965	Safe Handling of Compressed Gases
29 CFR 1926, Subpart D	Occupational Health & Environmental Controls
29 CFR 1926, Subpart E	Personal Protective Equipment
29 CFR 1926.406(c)	Electrical – Special Purpose Equipment
49 CFR 171-180	Hazardous Materials Regulations

At Conewago, there are two basic types of welding operations:

Oxygen-fuel gas welding Arc welding

Whenever welding, cutting, or brazing occurs, everyone involved in the operation must take precautions to prevent fires, explosions, or personal injuries from exposure to toxic fumes. Even in metal cutting or repair jobs that are considered routine, workers should always follow established safety procedures.

Common place dangers involving welding, cutting and brazing include:

- Damage to eyes and skin from continued or repeated exposure to ultraviolet and infrared rays.
- Closed containers that once held flammables or combustibles.
- Toxic gases, fumes, and dust, which may be released during welding and cutting operations.
- Explosion hazards due to improper ventilation.
- Welding of stainless steel can expose employees to Hexavalent Chromium. In the rare situation that this is performed, the use of a clean air hood will be used in addition to any additional PPE as necessary.

Training:

It is the policy of Conewago to permit only trained and authorized personnel to operate welding and cutting equipment.
Training covers the operational hazards of our cutting and welding operations. Conewago Welding and Cutting certification training is out-sourced. Safety training for welders is conducted in-house and includes:

Compressed gas safety
Fire prevention to include the proper use of fire extinguishers
Respirators
Confined spaces
Fall protection
PPE
Hazard communications

Maintenance

Any deficiencies found to welding and cutting equipment must be repaired, and the defective parts replaced, before continued use.

Precautions

In addition to various safety training topics, it is good work practice to consider the following additional precautions:

Protection from burns

Wear dry, hole-free, insulating gloves.
Do not wear pants with cuffs, shirts with open pockets or any clothing that can catch and hold molten metal and sparks.
Wear high-top steel-tipped boots.
Use approved helmets or hand shields that provide protection for the face, neck, and ears. Keep clothing free of grease, oil, solvents, or other flammable substances.
Remove any combustibles, such as a butane lighter, or matches, from your person before welding or cutting.
Use noncombustible screens or barriers to protect nearby persons and property. Don't let hot work pieces lie unattended without alerting others of the burn and fire hazards.

Avoid overexposures

Keep your head out of the fumes.
Do not breathe the fumes.
Use mechanical ventilation or exhaust to keep fumes and gases from your breathing zone. If engineering controls are not feasible, use an approved respirator.
Do not arc weld while standing on damp surfaces.

Hot Work Permits

Occasionally our work is completed in existing owner-occupied buildings or buildings where subcontractors are working in the same general area. Many companies require hot work permits when welding and cutting inside their buildings. Consult with the Safety Department in situations where hot work permits are required or advisable.

A. Approval

1. "Hot Work" means riveting, welding, flame cutting or other fire or spark-producing operations. All hot work must be approved by Conewago's Site Superintendent.

2. No hot work shall be performed until all sections of the "Hot Work Permit" form have been completed and signed by the Conewago Site Superintendent or his representative, indicating approval.

B. Fire Watches

1. If the Conewago Site Superintendent determines that a Fire watch is necessary because combustibles cannot be removed or protected, the personnel doing the Hot Work shall provide a Fire watch.

2. The Fire watch must be sufficiently trained in the use of fire extinguishers and have no other duties or responsibilities than to monitor the work site for fires.

3. The Fire watch must, at a minimum:

   a. Have a fire extinguisher (and be trained in the proper use);
   b. A means to keep the work area wet.
   c. A Fire Alarm Control Switch (if available).
   d. Remain in the area for 30 minutes after hot work is completed.

4. Multi-Fire watches may be required for large work areas or overhead work, where sparks might fall to lower levels.

C. Fire Protection and Safety

1. All drainage openings in the vicinity must be covered prior to the start of hot work.

2. All combustible, flammable, and other ignitable materials must be removed from the hot work area to a minimum 35 feet distance away or guarded with welding blankets or similar shields.

3. Oxygen and acetylene bottles used by welders shall be properly secured and kept away from flying sparks and/or hot metal.

4. All welding or other hot work equipment must be properly grounded.

5. Valves and blinds isolating equipment for hot work shall be properly tagged and locked, where necessary.

6. Fire extinguishers shall be readily available at all times while hot work is being completed.

Enforcement Authority

A. Expressed Authority

All Conewago Employees have the expressed authority, right and responsibility to actively enforce all of the programs and procedures described herein. If given instructions that you believe may be contrary to or in conflict with your own best judgment, you should use your STOP work authority and solicit the input of:

1. Your supervisor or designated Foreman /Job Site Safety Coordinator, and/or

2. The Conewago Job Site Superintendent

3. The Conewago Safety Director or Safety Department.

B. Zero Tolerance

No one will be allowed to work in violation of the safe work practices, programs, and procedures described herein as well as other generally accepted safe work practices.

Any subcontractor supervisor or jobsite safety coordinator who knowingly permits or authorizes an employee under his control to violate the safe work practices, programs, and procedures described herein will not be allowed to work on a Conewago Job Site until the supervisor's employer or manager states in writing the steps that have been taken to correct the violation and prevent it from reoccurring.

C. Question Questionable Conditions

When you have a question or are unsure of the level of safety relative to a task that you have been asked to perform, or the conditions under which you are expected to perform those tasks, you are expected to ask your supervisor/Foreman, designated Job Site Safety Coordinator, the Conewago Site Superintendent, Field Safety Manager, or the Conewago Safety Director until you are satisfied that the work can be performed safely. The time to inquire is **BEFORE** you begin a questionable task.

CONCLUSION

By following the safe work practices outlined in this booklet, you will contribute significantly to the successful and safe execution of work completed at Conewago Job Sites.

The Safety Policies and Procedures of Conewago are a collection of safety requirements adopted over an extended time of continuous safety improvement. Conewago will continue to observe the activities of its workers and those of others in comparable working conditions. When better safety policies and procedures are discovered and proven, they will be adopted.

All CEI and subcontractor employees have STOP work authority and are expected to use it immediately if an unsafe condition or work practice is noticed. The crew Foreman, site Superintendent and Safety team should be contacted to assist in correcting the unsafe condition.

EMPLOYEE AND/OR SUBCONTRACTOR ACKNOWLEDGMENT

I hereby acknowledge receipt of the Conewago Safety Manual.

I have reviewed its contents and agree to abide by all of the rules, safe work practices, programs and procedures described therein, as well as all other Safety and Health and Environmental rules and regulations of Conewago.

I further agree to perform all tasks which may be assigned to me in a safe manner, using generally accepted safe work practices and keeping the safety of myself and those around me foremost in my thoughts.

_____

NAME (Please Print)

_____

SIGNATURE

_____

COMPANY NAME

_____

Date

_____

COMPANY SAFETY COORDINATOR