

2016

**Corporate Safety, Health &
Environmental Manual**


TARLTON

LET'S
BUILDSM

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	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-MISSION
		Initial Issue Date	5/1/2015
SAFETY MISSION / MANAGEMENT STATEMENT OF POLICY		Revision Date:	3/19/2018
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To ensure the health and safety of all persons on all V & O Services Inc. Corporation project sites, our "Safety First" attitude includes your active participation with OSHA compliance, safety training, the policies outlined in this manual and the principles illustrated below.

Safety and health are a shared responsibility. Everyone from top management and supervisors to each and every worker must take ownership of their own safety and that of co-workers. Everyone is a safety officer! You have the authority and responsibility to stop any unsafe act to include shutting down a project until that unsafe condition is rectified.

We recognize that the prevention of accidents and the promotion of safe working practices are of the greatest importance. Maintaining a safe and healthful work environment is not just an idea – it is a top priority.

We realize that the attitudes of our employees towards safety are of paramount importance in the effective operation of our accident prevention program. Supervisors must constantly endeavor to maintain safe working conditions and keep accident prevention as an essential part of their planning and operations.


It is everyone's job to spot hazards and to correct them or report them immediately.

The hazardous nature of our work will not be accepted as a reason for failing to do all that can be done to eliminate or reduce the waste and suffering that accidents cause. We must do everything possible to decrease work hazards and strive for the best safety experience record possible.

We strongly urge all V & O Services Inc. Corporation employees to fully embrace and continually strive to implement the principles listed above as well as our entire safety program. Most importantly, you are our greatest asset; we want you to leave the job each day in the same condition as you arrived. Use this manual to guide you in actively supporting the corporate safety culture and in preventing incidents on your job.

Loreta Fricano
President

Charlie Schramer
Exec. Vice President/COO

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC ADMIN
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SAFETY ADMINISTRATION		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

The Corporate Safety Department oversees all aspects of the company with regards to safety to include development, implementation and maintenance of corporate policies, procedures and programs for safety, health, loss control and risk management.

The Corporate Safety Department’s mission is to develop best practices for a variety of construction-related safety concerns in an effort to create a safer work place for our employees and the community. The safety department will monitor the programs and advise the executive management of changes to policy.

PROCEDURE

The Safety department will operate in the following manner:

Department Staff: The Corporate Safety Department will consist of a full-time Corporate Safety Director, full-time Assistant Safety Engineer, full and part-time Safety Engineer(s), and a full-time Safety Assistant as required.

Record Keeping: V & O Services Inc. Corporation tracks training, Jobsite Safety Audit Reports, Job Safety Analysis, Incidents, TBT’s, Site Specific Orientations, man-hours, etc. This information will be used as the basis for end- of-project safety performance evaluations.

All professions have a code of ethics to follow; construction and safety professions are no different. In order to utilize the safety program to its fullest extent, all documentation must be prompt, accurate, and truthful. Any falsification of safety records or reports is against the law and is grounds for immediate termination of employment. If you have any questions regarding reports, records or general safety documentation, please contact the Corporate Safety Director.

Enforcement: Constant awareness of and respect for hazards and compliance with all safety rules are considered conditions of employment. The project management team (Foremen, Superintendents, Engineers, Managers and Directors) as well as individuals in the Safety Department, Human Resources Department and executive management reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this program.


Changes to Plan: The Corporate Safety Director and the Executive Vice President/COO will approve any changes to this manual or any of its policies. Employees shall be notified and trained, if necessary, in any new procedures. A copy of this manual and all approved changes shall be maintained at each project site.

OSHA REFERENCE

NA

RELATED SECTIONS

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-ASSESSMENT
		Initial Issue Date	5/1/2015
CORPORATE SAFETY PROGRAM ANNUAL ASSESSMENT POLICY		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

The purpose of this policy is to establish a process for reviewing V & O Services Inc.'s current safety program in order to amend the program and/or safety manual as necessary.

PROCEDURE

The following areas or elements will be reviewed annually to institute new policies, programs, procedures and industry best practices. In conjunction with review of the following safety program elements, the Annual Program Evaluation form will be completed each year to set goals, plan and assess progress.

Zero Accident Goal:

V & O Services Inc. is committed to continued safety program improvement to achieve or improve upon our goal of Zero Accidents. The Safety Committee, V & O Services Inc. Executives and Safety Director will work together to establish new program goals and make program improvements as necessary to advance the safety culture.


The following areas will be assessed annually to develop new goals and improvement areas: safety performance and safety task completion at the completion of each job (V & O Services Inc. termed "Safety Closeout Scoring"), safety audit results and trending, quality and consistency of near miss reporting, hazard reporting

& safety suggestions, opportunities for "spot recognition" for exceptional safety performance, trending of incidents, accidents and near misses and OSHA statistics. V & O Services Inc. will attempt to use leading indicators of safety performance with review of the safety tasks completed on the jobsite, safety audit results, near miss and hazard reporting and safety suggestions. Lagging indicators of performance such as incident cause and type, as well as OSHA statistics, will also be reviewed.

Closeout Scoring:

At the end of a project, V & O Services Inc.'s Safety Team provides a compilation of various safety factors which is provided to the Project Team and V & O Services Inc. Executives for review at the closeout meeting. The Safety Team also produces a Closeout Tracking Report which is distributed monthly to all project team members so that they may track their safety progress throughout the duration of the project. The safety factors considered in closeout scoring include:

- **Project Difficulty Rating**
A safety startup is conducted prior to project start to review potential safety hazards presented by the upcoming work and to review and any Owner safety requirements. The project receives a difficulty rating based on the hazards identified.
- **Safety Startup Attendees**
The Project Manager, Project Engineer and Superintendent are required to attend the safety startup meeting. Their attendance is noted on the closeout score.
- **Site Safety Orientations**
Projects are required to conduct a site-specific safety orientation for every V & O Services Inc. employee onsite.
- **Job Safety Audit Report (JSAR)**
Projects are required to document one JSAR for every week of the project's duration.
- **Toolbox Talk (TBT)**
Projects are required to document one TBT for every week of the project's duration.
- **Recordable/Major Incidents**
Points are deducted for any recordable or major incidents that occur on the project.

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- Safety Team Audit Score Average
The project earns points based on the average of the Safety Team's audits conducted throughout the project duration. Findings from these audits are scored, documented and shared with project team members.

Near Miss/Good Catch Reporting:
(Employee Participation)

Near miss incidents are defined as an incident that could have resulted in an injury, illness, medical treatment and/or property damage. To be proactive in safety, near miss incidents need to be identified and addressed. In cases where there could have been a potential injury, equipment damage, property damage, or bad public relations, complete a Near Miss Report.

Good catch incidents are defined as an unsafe condition or act that was recognized, which if let unaddressed, could have resulted in an injury, property damage, or outage. This could also be a positive recognition of a good work practice or behavior which helped create a safer environment. To be proactive in safety, good catch incidents need to be identified and addressed. In these cases, complete a Good Catch Report.

Spot Recognition:

While visiting project sites, V & O Services Inc.'s Safety Team rewards safe behavior that goes over and above with gift cards, t-shirts, etc.

Incident Trending:

(Injury & Illness Rate Review)

V & O Services Inc. will review each year and multiple years of injury and illness data to determine any identifiable trends in incident type, cause and exposure that need to be targeted during safety audits, for additional training or awareness and for policy or procedural changes.

OSHA Statistics:

V & O Services Inc. will review OSHA statistics, Incident Rate (IR), Days Away, Restricted or Transferred (DART), Lost Work

cases/days, Light Duty cases/days and Recordable incidents and use this data to track as a lagging indicator to determine program performance based on OSHA and Industry Standards.

OSHA REFERENCE


1926.600 Subpart O, Equipment

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Annual Safety Program Evaluation

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-RESPONSIBL
		Initial Issue Date	5/1/2015
STAFF RESPONSIBILITIES		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

To illustrate and promote a total corporate safety culture, each position of the project team shall actively support the safety objectives of the company and be held responsible for the overall enforcement and performance of the safety program for each project.

In accordance with federal regulations, the employer is responsible for providing a safe work environment for its employees. OSHA extends that responsibility to the prime contractor controlling the site and subcontractors or individuals within company management as a prime contractor.

PROCEDURE

1. Coordinate and supervise the safety program for all V & O Services Inc. Corporation employees and subcontractors on the project site.
2. Project manager shall ensure safety start-up meeting is conducted with the project team, assigned safety engineer and Corporate Safety Director, prior to the Executive start-up meeting.
3. Project team shall conduct site-specific orientations for all V & O Services Inc. Corporation employees and Subcontractors new to the project site.
4. Conduct weekly Tool Box Talks (TBT) on each site with all site personnel including subcontractors in attendance.
5. Project Superintendents shall be responsible for ensuring a Pre-Task Safety Plan is completed at a minimum each day for each task and crew prior to the beginning of the shift.
6. Conduct weekly Job Safety Audit Reports (JSAR) safety inspections for each project and forward documentation to Safety Assistant. All Superintendents, PM's, and PE's must complete weekly JSAR's for each assigned project(s).
7. Ensure that all required Personal Protective Equipment (PPE) is provided and used as required.
8. Forward copies of all safety related communications/documents to the Safety Assistant.
9. Project site team shall respond to all suggestions made as a result of inspections on project.
10. Report all incidents, near misses, and good catches in accordance with Section 18 of the Corporate Safety, Health and Environmental Manual.
11. Project team shall review all accident reports and investigations with Safety Director. Ensure suitable corrective action has been taken to prevent similar occurrences (see Section 18).
12. Include V & O Services Inc. Corporation safety program requirements at all subcontractor pre-construction meetings. Point out any unusual conditions or methods to be used or encountered on the project site. Require all subcontractors to provide a Site-Specific Safety Program to address hazards associated with their scope of work prior to job start.
13. Post all required OSHA, EEO documents and posters on the project bulletin board. Also post a list of phone numbers for emergency response. Maintain a list of emergency contact numbers for all subcontractors.
14. Review and provide protection for the general public e.g. fences, barricades, sidewalks and streets. All appropriate warning signs and flagging should be erected and maintained.
15. Provide adequate toilet facilities required by the project size.
16. The competent person for OSHA Safety and First Aid/CPR is the Superintendent unless otherwise specifically designated.
17. Code all incident related project costs to cost code 1551. This code will be used to capture the labor cost for an injured employee, any attending field craft workers to travel to a medical facility to seek treatment, labor costs for subsequent visits to a medical facility, and labor costs for physician

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approved light duty. The cost code will also capture material costs for medical bills or deductibles associated with an incident and equipment costs for equipment lost or damaged as a result of an incident.

18. Document all on-the-project safety training sessions (TBT, PTSP, etc.), project site inspection results, incidents, deficiencies, near misses, safety warnings and subcontractor directives. Falsification of any document is a violation of corporate policy and may result in immediate dismissal.

OSHA REFERENCE


In accordance with Subpart B of 29 CFR 1926.16(a) "...In no case shall the prime contractor be relieved of overall responsibility for compliance with the requirements of this part for all work to be performed under the contract."

RELATED SECTIONS

Weekly Tool Box Talk (TBT) Meetings (Section 16)
Project Inspections (Section 17)
Incident Management (Section 18)
Pre-Task Safety Plan (Section 21)

APPLICABLE FORMS (APPENDIX B)

Toolbox Talk (TBT)
Job Safety Audit Report (JSAR)
Pre-Task Safety Plan (PTSP)

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PURPOSE & APPLICATION

All V & O Services Inc. Corporation Safety Personnel, Project Directors, Project Managers, Project Engineers, Superintendents and selected Foremen are required to complete and keep current their certifications to meet the corporate safety training requirements.

V & O Services Inc. Corporation is committed to having the best-trained personnel. This commitment encompasses all training: technical, managerial and safety.

The following courses are mandatory for all project supervisory personnel:

<u>Course</u>	<u>Renewal Period</u>
OSHA 10 Hour Course	3 years
First Aid	3 years
CPR/AED	2 years*
Bloodborne Pathogens	1 year
Incident Investigation	3 years
Hazard Recognition & Evaluation	2 years
Reasonable Suspicion Drug & Alcohol Testing	1 year
Craft worker Orientation (Non-Supervisory position)	1 year
OSHA 30 Hour Course or Equivalent Competent Person training that meets or exceeds 30 hours initially, 8/hrs annually	Minimum 8 hours/year
Safety Documentation	As Needed

*Renewal may vary based on certification provider.

In addition to the above, the following courses may be required for Project Engineers, Superintendents or Supervisors:


<u>Course</u>	<u>Renewal Period</u>
Confined Space	3 years
Excavation	3 years
Fall Protection	3 years
Safety Documentation	As Needed
Scaffold Safety	3 years
OSHA 30 Hour Course initially, plus 8 hours of approved Safety training annually	1 year

The following courses are mandatory for the office project team:

<u>Course</u>	<u>Renewal Period</u>
OSHA 30 Hour	Once
Annual 8 hours of supplemental safety training	1 year

The following course is mandatory for all field personnel:

<u>Course</u>	<u>Renewal Period</u>
OSHA 10 Hour	3 years

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PROCEDURE

The Corporate Safety Department will schedule the above courses for the project staff and coordinate their certification and re-certification. All training will be coordinated with a minimum 2-week notice. Employees are responsible for attending their scheduled courses. Should employees need to cancel a course they must provide 1-week notice to the Corporate Safety Director. In emergency situations, notify the Corporate Safety Director as soon as possible. If an employee misses two scheduled training sessions in a row, or three over a one year period, they will receive a letter of notification that will be copied to their personnel file for record and will result in disciplinary action.

OSHA REFERENCE


Subpart C of 29 CFR 1926.21(b)(2) and 1926.32(f) requires that “all employees be trained in the recognition and avoidance of unsafe conditions and...to control or eliminate any hazards or other exposure to illness or injury.” The regulation further defines the requirements of a “competent person.”

RELATED SECTION

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-ORIENT
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NEW EMPLOYEE ORIENTATION		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

Statistics show that nearly 70% of all accidents occur as a result of unfamiliarity with the task or unfamiliarity with the project. *This means that new employees or employees new to a project are most likely to be involved in incidents.*

The new employee and site specific orientation programs minimize the risk of new employee incidents. V & O

Services Inc. Corporation requires all new employees to receive corporate and site specific orientations.

Current

employees who are new to a project (have not been on the project in the last six-months) will receive a site-specific orientation only.

PROCEDURE

All employees shall review the corporate safety policies in conjunction with the corporate orientation program.

Craft Workers

On the first day of work, all new craft workers will be given a safety orientation and complete a Drug & Alcohol test (if not active in consortium or has not been tested in the last 120 days). Orientations will include an orientation presentation, a quiz and a brief overview of the minimum safety requirements for all employees. New employees will be required to sign and acknowledge understanding of V & O Services Inc.'s minimum safety requirements.

All new employees will comply with V & O Services Inc. Corporation's Drug & Alcohol Policy outlined.

In addition, all supervisory personnel will closely monitor all new project employees to ensure that they are adequately familiar with proper work techniques and associated safety requirements. These items will be discussed during the mandatory Site Specific Orientation Checklist that will be conducted by the project Superintendent or another qualified person for each individual on the project site. The supervisory staff must correct any deficiencies noted at once.

New Foreman and Superintendents will be given a New Foreman/Superintendent Orientation.

OSHA REFERENCE


NA

RELATED SECTIONS

Drug and Alcohol Policy (Section 20)

APPLICABLE FORMS (APPENDIX B)

Site Specific Orientation Checklist

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-MINIMUM
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PURPOSE & APPLICATION

All projects must meet these minimum safety requirements to provide a safe work environment for our employees.

The Minimum Safety Requirements listing found in Appendix B serves as a guide for providing a safe work environment but is not all inclusive as each project has its own site-specific requirements based on the hazards and each hazard carries its own detailed requirements.

PROCEDURE

Every new V & O Services Inc. employee will read V & O Services Inc.'s Minimum Safety Requirements and acknowledge understanding with his/her signature.

OSHA REFERENCE


NA

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Minimum Safety Requirements

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-PR MIN
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PROJECT MINIMUM SAFETY REQUIREMENTS		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

All projects must meet these minimum safety requirements to provide a safe work environment for our employees.

The project team is responsible for providing and maintaining a safe project site and must meet all applicable requirements of the V & O Services Inc. Corporation Safety Manual, Federal Regulations, Owner Requirements or requirements of the Corporate Safety Team, an Officer of the company or V & O Services Inc. Corporation's insurance representative(s).

PROCEDURE

1. Each project is to have first aid materials and supplies, which are sufficient to handle emergencies. There will be at least one first aid certified person on each project at all times.
2. All incidents must be reported immediately to the Superintendent no matter how minor.
3. Incident reports are to be written by the Superintendent, including minor first aid cases. The Corporate Safety Director is to be contacted immediately on all incidents.
4. Tool Box Talks (TBT's) will be conducted each week on all V & O Services Inc. Corporation projects.
5. The Superintendent will make a daily safety and fire inspection of the project. Hazards noted will be corrected as soon as possible.
6. A sufficient supply of fire extinguishers or fire suppression equipment will be available on the project and the location clearly marked and made known to all employees.
7. Every attempt will be made to engineer out all possible fall hazards regardless of height. Where this cannot be accomplished, guardrails and barriers will be used as required. All floor and wall openings will be protected. Any unprotected fall hazard above 6' will have appropriate fall protection, i.e., harness and lanyard.
8. Housekeeping must always be maintained at an exceptional level to allow for a safe and effective work environment. Materials will be stored in an orderly fashion. Work areas will be kept as clean as possible. Traffic pathways will be available through all areas. Hazard free landing areas at tops and bottoms of ladders and stairways will be maintained.
9. Flagmen or other traffic control devices will be used to provide worker protection and to minimize risk at public access areas. Coordinate use of hard physical barricades to protect workers from public vehicle access.
10. Excavation work will always be conducted in a safe manner. Any excavation deeper than 4' will require a means of safe access and will require a determination for proper protection per OSHA standards.
11. Compressed gas cylinders will have protection caps in place and valves shut off except when in use. Cylinders will be stored and transported in an upright position and will be secured at all times. Oxygen, acetylene and liquid propane must be stored separately (20' minimum) and per storage requirements.
12. All temporary 15 and 20 - amp outlets on single phase, 120-volt circuits for construction sites must be protected by a ground-fault circuit interrupter (GFCI's) and/or assured equipment Grounding Conductor Program where required by client.
13. Only approved safety containers and portable tanks will be used for storage and handling of flammable and combustible liquids. Plastic gas containers will not be allowed. Only authorized personnel will transport gasoline. All portable containers will be marked indicating the contents of the container. Outside storage tanks will be located a safe distance from all buildings, and a dike or

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other effective method of protection will be provided for possible spills. The area around the tank will be kept free of combustible material and will have NO SMOKING signs posted. Appropriate size and type fire extinguishers will be located nearby. Properly constructed storage areas shall be location 50' from combustible materials and shall be properly identified and protected.

14. Inspect all construction vehicles and equipment daily before use. Bi-directional equipment shall be equipped with a backup signal alarm when required.
15. Scaffolding will be erected per the Scaffolding section of this manual, to include full decking, use of guardrails regardless of height. Scaffolds shall be inspected by competent person prior to use and tagged as required.
16. Special care must be taken to prevent injury to the public or damage to public property. Warning signs, lights, barricades, etc., will be erected and maintained where necessary.
17. Project Inspections: Each week, in conjunction with the weekly TBT, a Jobsite Safety Audit report (JSAR) is to be completed on all projects. This form will highlight the good points and areas of concern for safety on each project.

OSHA REFERENCE

The minimum project requirements are compiled from many subparts of 29 CFR 1926, however, the contractor requirements to comply with OSHA regulations are referenced in Sub part C 1926.20(a) stating that "...no contractor or subcontractor...shall require any [person] employed in the performance of the contract to work in surroundings or under working conditions which are unsanitary, hazardous, or dangerous to his health or safety."

RELATED SECTIONS

NA


APPLICABLE FORMS (APPENDIX B)

Tool Box Talk (TBT)

Jobsite Safety Audit Report (JSAR)

Incident Forms

Mobile Equipment Inspection

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-DISCIPLINE
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PURPOSE & APPLICATION

In order to ensure a safe workplace for our employees, it is necessary to establish a company-wide disciplinary policy for enforcement of safety rules.

Although not the preferred method, the intent of the discipline policy is to have a positive impact in improving safety on all projects and limiting liability to all other employees by setting a clear, consistent policy. It is also V & O Services Inc. Corporation’s policy to dispute unemployment benefit claims filed by workers dismissed for safety violations.

The Corporate Safety Director, Safety Team Members, Superintendents and company officials will utilize the Disciplinary Action Policy as necessary to enforce compliance with the V & O Services Inc. Safety Program and applicable OSHA Regulations.

In any case where failure to enforce V & O Services Inc. Corporation’s safety rules has placed employees in imminent danger, the employee and/or supervisor may be subject to disciplinary action immediately.

All V & O Services Inc. employees as a condition of employment are required to comply with all safety rules / safe working procedures and applicable OSHA Regulations.

PROCEDURE

Documentation of safety violations will be made via Safety Audits, Daily Reports, Email and the Safety Violation Form. All reports of safety violations will become part of the employees personnel file.

V & O Services Inc. Corporation has a ZERO tolerance policy for violence and/or threats of violence by any site employees (V & O Services Inc. or subcontractors). The class of Disciplinary Action will be determined by the severity of the occurrence.

CLASSES OF DISCIPLINARY ACTION:


The Disciplinary Action Policy is not necessarily a step-by-step process!

Class #1 - Verbal Warning – Example of Class #1 violation: Failure to utilize proper personal protective equipment, the exposure potential may be relatively minor and the employee has not received a previous warning for the same or similar violation.

Class #2 - 1 Day Off – Example of Class #2 violation: Employee fails to follow established safety guidelines, the exposure potential is moderate to high and/or this is a first offense.

Class #3 - 3 Days Off – Example of Class #3 violation: Employee fails to follow established safety guidelines, the exposure potential is high and/or this is a repeat offense.

Class #4 - Termination – Example of Class #4 violation: A) Employee has repeatedly failed to follow proper safe work procedures and/or blatantly disregards safety measures even after being warned. B) Hazard potential is severe and could result in major injury and/or death. C) Employee is a foreman who has been properly trained and fails to follow established safety rules/guidelines. Setting a poor example will not be tolerated! [Terminated employees may be considered for re-hire after one year.]

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All subcontractors working for V & O Services Inc. Corporation, as a condition of contract, agree to comply with all V & O Services Inc. Safety, Health, and Environmental Program requirements and applicable OSHA Regulations and as such will also be subject to actions under the Disciplinary Action Policy (additional information regarding subcontractor disciplinary action is contained in Section 10).

The Corporate Safety Director, Project Managers, Project Directors, and company officials at their discretion may use any of the previously mentioned classes of disciplinary action to ensure compliance with the V & O Services Inc. Safety Program and applicable OSHA Regulations. It is the responsibility of the safety officer, the project managers, the project superintendents and the foremen to observe and enforce the safety compliance and work rules compliance of the employees each supervises alone or severally.

In the event of a safety or work rule violation, the supervisor shall determine the Class of Disciplinary Action to be taken depending on the severity of the infraction, meet with and review the violation and expectations for corrective actions with the employee involved.


An owner's jobsite safety procedures may differ from V & O Services Inc.'s safety procedures; in such a case, whichever procedure is the most stringent is the policy the employee should follow. Prior to beginning a new project, review V & O Services Inc.'s safety orientation and the jobsite specific safety orientation to see what differences may exist. If you have questions about a safety issue, ask your supervisor for clarification.

Employees found in violation of safety rules or company policies and procedures may be subject to disciplinary action procedures up to and including termination depending on the perceived severity of the violation by his/her supervisors.

CRAFTWORKER MINIMUM SAFETY REQUIREMENTS

Each employee "shall comply with all Occupational Safety and Health Association standards and all rules, regulations and orders issued under the Act." Employees shall by signature acknowledge they understand and will adhere to the following items as V & O Services Inc.'s Minimum Safety Requirements:


1. I have the authority and duty to "STOP WORK" due to an unsafe act or condition until that act or condition is resolved.
2. Every V & O Services Inc. Corporation jobsite requires 100% hard hats, safety glasses, hi-vis outerwear, gloves, and sturdy work boots for all employees and visitors at all times. Additional PPE requirements may be outlined in a site specific safety plan.
3. I must report any incident, accident, or near miss to the Superintendent immediately, no matter how minor.
4. If I am working at an elevation above 6', I will ensure there are proper handrails or I must tie-off to an approved connection point, designed to prevent falling more than 6' or contacting a lower level or obstruction. **6' Rule – Fall Protection**
5. If I remove a hand rail, guard rail or hole cover, I am responsible for replacing it immediately upon completion of my task; there is no trade jurisdiction for replacing safety items.
6. I will ensure any ladder I am using will extend at least 3' above the top platform, will be placed on stable footing, will be tied off at top and bottom, will have non-skid shoes, and will be inspected prior to each use.
7. I will not use stepladders on the top two rungs or use them in a folded position.

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8. I will inspect each tool or piece of equipment prior to use. I will identify and report any defects, remove the tool from service and return it to the TEAM Facility for repair.
9. I will use a ground-fault circuit interrupter (GFCI) on all required construction power.
10. I will ensure any equipment or power source is locked and tagged out prior to working on or near it. I will never remove a lock or tag of another employee or start up on an operation with a tag on it.
11. I will never walk or work under a suspended load and will ensure a competent person has inspected the rigging of any of my materials.
12. I will keep my work area as clean as possible at all times.
13. I will not enter any excavation deeper than 5' without proper benching, sloping or engineered shoring per OSHA standards.
14. I understand the possibility of exposure to hazardous materials exists. I have a right to know what the substances are, how they might affect me, and what the steps are to be taken to protect myself. I understand this information is on the Safety Data Sheets (SDS) located at the project office or other designated area.
15. I will use proper lifting techniques to include keeping my feet shoulders-width apart, getting a firm grip, lifting with the legs and not the back, avoiding twisting the torso, and always getting help if the object is heavy or awkward.
16. Prior to entering a confined space, I must be trained, have proper PPE, air monitoring and retrieval equipment, and must use a confined space entry permit.
17. If I encounter or suspect any material resembling asbestos or lead, I will cease work in the area until the material is identified. If the material is tested and confirmed to be hazardous, a qualified independent contractor will perform abatement.
18. **I will request a site specific orientation from the Project Superintendent before starting work on any new site.**
19. I understand any V & O Services Inc. Corporation employee found to be under the influence of or actively using alcohol or other controlled substances will be grounds for immediate dismissal.
20. I understand offensive language, apparel, fighting, or possession of any weapon may be grounds for immediate dismissal.

WORK RULES

1. Report to work fit for duty. Employees who are fatigued, ill, wounded, under the influence of drugs or alcohol (prescribed or not prescribed by a medical professional) which may interfere with job performance are not fit for duty.
2. Attend required weekly safety meetings. Safety meeting dates, topics and attendance shall be documented and the records maintained. If you have questions about safety, ask.
3. Perform assigned tasks and duties safely and competently.
4. Report any unsafe condition immediately to the supervisor or site foreman.
5. Use and care for V & O Services Inc.'s tools and property in a responsible and safe manner.
6. Be alert and observe safety signs, notices, barricades and warnings posted on the job site.
7. Should any question arise concerning the safety of a particular procedure, task, tool or operation, contact a supervisor to review the question to avert a possible incident.

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8. Report for work on time and as scheduled. Tardiness, absenteeism, and early quits are not acceptable and may lead to disciplinary action or termination.
9. Use designated areas on the jobsite for breaks, parking, smoking, rest-rooms, and working.
10. Horseplay and gambling on the job are prohibited.
11. Harassment of any type is prohibited; this includes sexual harassment in word or gesture.
12. Unauthorized use of company vehicles is prohibited.
13. Compliance with safety regulations and procedures is expected. Non-compliance with safety regulations may lead to disciplinary action or termination.
14. Refusal or failure to perform work assigned or to comply with supervisory direction (insubordination) shall not be tolerated and will be grounds for dismissal.

OSHA REFERENCE


OSHA does not specifically reference disciplinary policies but does state in Subpart C 1926.20(b) *Accident prevention responsibilities*. "It shall be the responsibility of the employer to initiate and maintain such programs as may be necessary to comply with this part."

RELATED SECTIONS

Drug and Alcohol Policy (Section 20)
Company Vehicle & Defensive Driving Policy (Section 43)

APPLICABLE FORMS (APPENDIX B)

V & O Services Inc. Employee Safety
Violation Confined Space Permit

	V & O SERVICES INC. CORPORATION Safety Management System		Doc No:	TC-SUBDISCIPL
			Initial Issue Date	5/1/2015
			Revision Date:	3/19/2018
	SUBCONTRACTOR SAFETY DISCIPLINARY POLICY			Revision No.
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PURPOSE & APPLICATION

As the prime contractor, V & O Services Inc. Corporation is responsible for ensuring that subcontractors are compliant with company policy, Owner requirements and federal regulations. All project subcontractors are contractually required to comply with all OSHA and Owner requirements as well as the V & O Services Inc. Corporation safety program.

Requiring compliance with these policies and standards reduces risks to our subcontractor employees, our individual employees, our projects and our clients.

Subcontractor compliance to our safety program is very important to V & O Services Inc. Corporation. It is a standard part of our contract and will be enforced on the project. The contract reads as follows:

“V & O Services Inc. Corporation will issue a Subcontractor Directive to the Subcontractor for repeated violations of Safety requirements and will require the Subcontractor to respond promptly to the Contractor’s Directive. Failure of the Subcontractor to correct the violation will cause V & O Services Inc. Corporation to take whatever steps are necessary to correct the violation in order to provide a safe worksite for everyone. Any associated costs incurred by V & O Services Inc. Corporation due to a Subcontractor’s violation will be the responsibility of the Subcontractor. Particular attention is called to the requirements of wearing hard hats and safety glasses by all personnel at all times on all jobsites; maintenance of good housekeeping conditions in all of its work areas; proper construction of all scaffolds, scaffold platforms, and job built ladders; barricading all excavations and/or floor openings resulting from Subcontractor’s work; replacement of all removals required to permit work access for/by subcontractor forces; and, taking due care to prevent fires from burning, welding or any other of its operations including the providing of adequate fire-fighting equipment in its work area.”


In the event that a Subcontractor Directive is issued to address non-compliance with an OSHA, V & O Services Inc. Corporation or Owner’s safety standards and the subcontractor fails to immediately correct the non-compliance issue, a deductive change order of \$250.00 may be issued as a penalty. If an additional violation of the same safety standard occurs, a \$500.00 deductive change order may be issued for the repeat violation. The funds acquired from this policy will be donated to a charity, not used by V & O Services Inc. Corporation.

PROCEDURE

Any failure of a subcontractor employee to follow the established requirements will result in use of the V & O Services Inc. Disciplinary Policy. Documentation of safety violations will be made via Safety Audits, Daily Reports, Email and the Safety Violation Form.

V & O Services Inc. Corporation has a ZERO tolerance policy for violence and/or threats of violence by any site employee (V & O Services Inc. or subcontractor). The class of Disciplinary Action will be determined by the severity of the occurrence.

All subcontractors working for V & O Services Inc. Corporation, as a condition of contract, agree to comply with all V & O Services Inc. Safety, Health, and Environmental Program requirements and applicable OSHA Regulations and as such will also be subject to actions under the Disciplinary Action Policy. Violations requiring a Class #2 disciplinary action toward employees of V & O Services Inc. subcontractors will result in formal written notification provided to Subcontractor management and request for verification of recommended correction action; violations requiring a Class #3 or #4 disciplinary actions will result in formal written notification to

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subcontractor and removal of the individual from the V & O Services Inc. jobsite, and/or issuance of Subcontractor Directive.

The Corporate Safety Director, Project Managers, Project Directors and company officials at their discretion may use any of the previously mentioned classes of disciplinary action to ensure compliance with the V & O Services Inc. Safety Program and applicable OSHA Regulations.

OSHA REFERENCE


Subcontractor requirements to comply with OSHA regulations are referenced in Subpart B 1926.16 *Rules of Construction* and particularly 1926.16(c) stating "To the extent that a subcontractor of any tier agrees to perform any part of the contract, he also assumes responsibility for complying with the standards...with respect to...his portion of the work..."

RELATED SECTIONS

Drug and Alcohol Policy (Section 20)

APPLICABLE FORMS (APPENDIX B)

Subcontractor Employee Safety Violation
Subcontractor Directive

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-STARTUP
		Initial Issue Date	5/1/2015
PROJECT SAFETY START-UP PROCEDURES		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 11 Page 1 of 1

PURPOSE & APPLICATION

To ensure safety is a properly planned activity, project start-up meetings will be conducted prior to all executive start-up meetings.

The project start-up meeting will establish clear policies and procedures for the project in conjunction with the V & O Services Inc. Corporation Safety Manual. The start-up meeting will also help determine specific project needs as well as determine the need for a site specific safety plan.

PROCEDURE

The Safety Assistant, Project Manager or Engineer requests a safety start-up meeting (minimum one-week notice).

The safety start-up meeting will accomplish the following:

- Discuss the ten item project safety performance evaluation criteria.
- Establish project-difficulty rating.
- Establish incident reporting and investigation criteria.
- Designate a competent person for specified project tasks.
- Ensure posting compliance with V & O Services Inc. Corporation safety board.
- Determine time for weekly TBT/JSAR meetings.
- Review the project scope and elements for inclusion in the SSSP and site employee orientation checklist.
- Develop site-specific safety plan as necessary.

Superintendents are provided a V & O Services Inc. Corporation “Job Box.” This will consist of a waterproof container that includes all paperwork (manuals, policies, forms, etc.) necessary to start and run a project. At the end of the project (or as needed) the Superintendent will bring the “Job Box” to their Safety Assistant (SA) to be restocked.

OSHA REFERENCE


NA

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Project Difficulty Rating

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		Initial Issue Date	5/1/2015
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		Next Review Date:	12/15/2016
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PURPOSE & APPLICATION

When required by the complexity of the project or by Owner requirements, Corporate Safety and the Project Team will jointly develop a site-specific safety plan.

The plan will consist of any known information important to the safety and health of personnel working at the project site and the distribution of that information to prevent situations which could lead to injury or accident.

The site-specific safety plan must meet or exceed all Corporate, Owner and OSHA safety criteria. It will be used as the document for managing safety on the project.

PROCEDURE

The safety start-up meeting will serve as the basis for developing the site-specific safety plan.

Development of the site-specific safety plan will be a cooperative effort between the Project Team and the Corporate Safety Director. Responsibility for implementation of the plan will be assumed by the Project Team. Conducting training or inspections will also be the obligation of site personnel. Specific tasks will be listed and copies distributed to the Owner when project specifics are known. The project management team will designate project-specific safety duties.

On-Site Emergency Response

In the event that medical assistance is not reasonably accessible to the jobsite, a first responder or an employee certified in CPR/First Aid/AED shall be assigned to the jobsite and made available to assist in the event of an incident. Employee providing first aid must have a valid and documented certificate from the American Red Cross, the US Bureau of Mines or an equivalent agency.

The site-specific safety plan shall take into account the possibility of employees being exposed to corrosive materials. If such materials are used, suitable eye-flushing and washing facilities for quick drenching of the skin/body or eyes shall be provided.

The plan will address the following:

Changes:


The site-specific safety plan is a working document and may be changed at any time. Changes need to be communicated to the Corporate Safety Department and/or Project Team.

Signage:

Establish posting requirements and location of safety board.
Establish marketing or Owner-specific signage requirements.

Reports:

Identify and address reporting requirements setup in the contract between V & O Services Inc. Corporation and the Owner.

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Permits:

Address site/Owner-specific permit requirements and processes.

Hazard Communication Program:

The plan will designate the on-site representative responsible for coordination of information between subcontractors, V & O Services Inc. Corporation and the Owner.

This person will request and compile Hazcom information and ensure employees are trained per V & O Services Inc.

Corporation requirements.

Site Inspections:

Establish inspection schedule and responsibilities and identify special inspection needs.

Reference the PROJECT INSPECTIONS section of this manual for the inspection process and checklist.

PPE:

Address any requirements over and above V & O Services Inc. Corporation's minimum safety requirements (Section 7 & 8).

Training:

Identify special training requirements for site, job tasks or competent person(s).

Tool Box Talks may be used to meet site-specific training needs and can be developed as part of the training plan.

Project Medical Assistance:

Identify First Aid Responder(s).

Identify local medical care facility.

Identify emergency medical care facility.

Identify emergency phone numbers and procedures.

Emergency Evacuation and Crisis Management

Identify on-site and off-site evacuation points.

Develop communication process for crisis management in accordance with V & O Services Inc. Corporation Crisis Plan.

Subcontractors:

Identify safety specific requirements relating to subcontractor scopes of work.

Identify need for subcontractor safety plans as required.

Subcontractors must provide Pre-Task Safety Plan (PTSP)


Site Specific Orientations

Identify orientation procedures (who, what, when, where).

Identify site-specific issues.

OSHA REFERENCE

Any subpart of 29 CFR 1926 may be referenced for the site specific safety plan.


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RELATED SECTIONS

Crisis Communication Plan (Section 15)
Emergency Action Plan (Section 41)
Project Inspections (Sections 17)

APPLICABLE FORMS (APPENDIX B)

Site-Specific Safety Plan (sample available in Forms & Shells)

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-POSTING
		Initial Issue Date	5/1/2015
PROJECT POSTING REQUIREMENTS		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
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PURPOSE & APPLICATION

High visibility signage is a way to promote a safety culture while also meeting federal posting requirements.

Keeping employees informed of hazards associated with their work is the responsibility of the employer. Federal law requires that certain signage and employment documents are posted in conspicuous places and/or are readily available for all employees to view.

Safety signage will be determined by the Corporate Safety Director or the site-specific safety plan. V & O Services Inc. Corporation has developed a standard safety board to be posted at all project sites. This safety board will meet all federal and state posting requirements and may need to be modified to meet owner specific criteria.

PROCEDURE

The following items will be included on the project safety board or posted in the project trailer:

- Medical Facility Location(s) and Contact information
- Orange Emergency Procedure card
- Project Emergency Phone Numbers list
- Hazcom Chemical poster
- Crane & Rigging Hand Signal Chart State & Federal Labor Law posters Notice regarding Drug & Alcohol testing
- Workers' Compensation poster
- Hard Hat & Safety Glasses sign
- V & O Services Inc. Corporation Safety, Health & Environmental Manual
- SDS Chemical Inventory book
- HR Policies and Procedures
- Safety Documentation
- Jobsite Safety Audit Report (JSAR)
- Pre-Task Safety Plan (PTSP)
- Tool Box Talk report forms

The following items are required but may not be part of the safety board:

- First Aid Kit
- Safety Glass Cleaning Station
- Visitor hard hats and safety glasses

OSHA REFERENCE

The project safety board is developed in accordance with Subparts B, C, and D of 29 CFR 19.26.

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-OSHA
		Initial Issue Date	5/1/2015
DEALING WITH OSHA		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

V & O Services Inc. Corporation is a member in good standing of the St. Louis Construction Industry Partnership Program, Labor – Management – OSHA. This entitles V & O Services Inc. Corporation to certain incentives to which only a handful of contractors are entitled.

The Occupational Safety and Health Act of 1970, as amended, is designed to give strict guidelines to employers for providing safety protection for employees. The Act also provides the employer with certain rights.

Whenever possible, an officer of the company or the Corporate Safety Director will communicate with the OSHA inspector during a project visit.

PROCEDURE

When an OSHA inspector arrives at your project:

1. Ask them to please go to the project office and wait while the Corporate Safety Director and/or an Officer of the company are notified.
2. Contact the Corporate Safety Director and/or an Officer of the company immediately.
3. The OSHA inspector will wait a reasonable time (approximately one hour) for a representative to arrive (per the OSHA operations manual).
4. Once the Corporate Safety Director or Officer of the company arrives, the opening conference can begin.
5. If the Corporate Safety Director or Officer of the company cannot be located in time, the Superintendent will notify the Project Manager.
6. An OSHA inspection report must be completed by Safety or the Project Team, accompanied by photos taken of all areas photographed by the OSHA Compliance Officer.

OSHA REFERENCE


29 CFR Part 1903 – Inspections, Citations and Proposed Penalties

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

OSHA Inspection Report

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		Initial Issue Date	5/1/2015
CRISIS COMMUNICATION PLAN		Revision Date:	3/19/2018
		Revision No.	1
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PURPOSE & APPLICATION

V & O Services Inc.'s Crisis Plan may be implemented in the case of a catastrophic event, death or disabling injury in any place where employees are present (jobsite or main office). Catastrophic events may include acts of God, natural disasters, toxic chemical releases, large hazardous material spills or any event of V & O Services Inc. employees or the owner that may cause media attention.

This plan endeavors to maintain company control during a crisis, and addresses both jobsite and office responsibilities.

The following are company procedures when dealing with the media.

Be courteous but do not speak to the media regarding the incident; refer all media questions to the Company Media Contact.

Speculation or premature statements could prove damaging to you, V & O Services Inc. Corporation, or the Owner. The Owner must first clear any and all information given to the media about our projects. The designated officer of the company will ensure the involved Owner clears the statement.

Prohibit workers from speaking to the media. Instruct workers to tell the media to contact the Company Media Contact. Our goal is an accurate and fair story.

Secure affected area and prohibit the media from entering the site or secured area. Explain that safety is paramount. Show them a safe area where they can stand or sit if necessary. Write down names of reporters or photographers and which publication, TV or radio station they represent. Contact Laura Lusson at 314-633-3300 with that information.

Clean up the area as soon as possible. The media may take this photo opportunity to create a controversy even if one does not exist. If photos or videotapes are taken, please remember to get the name of the photographer.

When discussing the incident with other employees or family members, communicate only facts; speculation only leads to miscommunication and unneeded suffering. Use a land line or cell phone to communicate confidential or sensitive information. Do not use two-way radio or fax.

PROCEDURE


Follow Corporate Crisis Plan Flow Chart procedures or the Crisis Team Leader's directions. All responsibilities are illustrated in the Crisis Plan Responsibility List; all responsibilities have a primary and alternate person listed. All external contacts are shown in the Crisis Plan External Contacts List.

OSHA REFERENCE

See paragraph 1926.35 of sub part C in 29 CFR 1926 for emergency action plan requirements.


RELATED SECTIONS

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-CRISIS
		Initial Issue Date	5/1/2015
CRISIS COMMUNICATION PLAN		Revision Date:	3/19/2018
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APPLICABLE FORMS (APPENDIX B)

- Crisis Management Responsibility Listing
- Crisis Management External Contact Listing
- Major Injury Flowchart (site-specific sample)

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-TBT
		Initial Issue Date	5/1/2015
WEEKLY TOOL BOX TALK MEETINGS		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 16 Page 1 of 1

PURPOSE & APPLICATION

One of the primary requirements of the V & O Services Inc. Corporation safety program is the weekly Tool Box Talk (TBT). At least once per week, each project is to conduct a TBT for all V & O Services Inc. Corporation employees.

Performance of these talks is a company requirement because: 1) they help in identifying jobsite hazards and ways to alleviate the hazards; 2) they allow the company to meet the continuing education requirements of OSHA.

Even if the particular TBT may not be relevant to the current project activities, personnel may move to projects where that information is applicable.

Attendance is mandatory and will be recorded on the Weekly TBT Report form. Send the original form to the Safety Assistant for scanning into the project e-files. The Corporate Safety Director is responsible to see that these talks are conducted on a consistent basis. All members of project team shall participate by periodically conducting a TBT on their assigned project(s).

A 52-week schedule has been developed to address topics within the safety manual and in accordance with OSHA requirements. Although the main topics are set, there is room for job-specific customization to reflect current corporate or project conditions. The best talk is one which deals specifically with one condition found onsite and which outlines the problem (hazard) and the specific corrective action to be taken.

PROCEDURE

All of V & O Services Inc. Corporation's senior management is committed to participating in the TBT meeting process.

Corporate Safety will publish a schedule showing meeting dates and the person responsible for conducting the meeting. Topic information will also be provided to all management personnel to facilitate their talks.

Note: For projects outside the immediate St. Louis area, this program may have to be modified.

All subcontractors are welcome to attend our meetings. If the subcontractors do not attend our meetings, they must submit copies of their weekly safety meeting minutes to the Safety Assistant.

OSHA REFERENCE


Specific training requirements are referenced in each of the subparts of 29 CFR 1926. The requirement for company training in general is referenced in subpart C paragraph 1926.21.

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

- Tool Box Talk (TBT)
- Tool Box Talk Schedule (sample)

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-INSPECT
		Initial Issue Date	5/1/2015
PROJECT INSPECTIONS		Revision Date:	3/19/2018
		Revision No.	1
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PURPOSE & APPLICATION

Project inspections are required by federal law. Having each team member involved in the inspection process provides a well-rounded approach to identifying hazards on a weekly basis.

It is imperative that V & O Services Inc. Corporation constantly evaluate the effectiveness of the corporate safety program. The inspection process is a means to evaluate this process by benchmarking safety on projects and to help illustrate our commitment to continuous improvement.

Corporate safety will provide Jobsite Safety Audit Report (JSAR) forms and may develop site or task specific checklists as needed.

PROCEDURE

The evaluation process is conducted as follows:

Weekly JSAR will be conducted by the Superintendents, Project Team member or TBT Presenter. (Note: The Project Team will be held accountable for ensuring at least one JSAR is completed weekly)

The Superintendent will have a craftsman available to the inspector while conducting the audit.

The inspector will use the Jobsite Safety Audit Report (JSAR) form as a guide in the safety inspection process. Any deficiency (even if immediately corrected) shall be noted.

Use the "Notes" section to highlight exceptionally good observations, unique hazards, repeat hazards or violations, and (most importantly) corrective actions taken.

The original completed JSAR form will be routed to the Safety Department and/or Project Assistant to be added to the project files.

The Project Team will use the JSAR form to ensure corrective action has been taken and repeated concerns do not continue.

Occasionally, V & O Services Inc.'s insurance broker's and carrier's loss control representatives may inspect projects. The Corporate Safety Director will coordinate the inspection schedule of loss control representatives and may accompany them on these inspections. It is important to extend our best courtesies to the insurance representative(s) and provide them access to all projects.

OSHA REFERENCE


29 CFR 1926 Sub part C paragraph 1926.20(b)(2) states "Such programs shall provide for frequent and regular inspections of the job sites, materials, and equipment to be made by competent persons designated by the employers."

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Jobsite Safety Audit Report (JSAR)

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-INCIDENT
		Initial Issue Date	5/1/2015
INCIDENT MANAGEMENT – REPORTING / INVESTIGATIONS		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 18 Page 1 of 2

PURPOSE & APPLICATION

All incidents, regardless of their nature, shall be reported and investigated.

It is an integral part of any safety program that documentation take place as soon as possible, so the cause and means of prevention can be identified to prevent a reoccurrence.

All incidents will be reported immediately to the Corporate Safety Director and investigated by a member of the project team regardless of the seriousness. In the event of an incident or near miss, the appropriate policy/plan shall be reviewed to determine if additional practices, procedures, or training need to be implemented to prevent similar type incidents from occurring.

PROCEDURE


Incident Management / Reporting

- Notify Superintendent / Foreman and first-aid trained personnel.
- Take victim to project office or bring first aid kit to injured person; administer first aid as necessary. Contact emergency medical services if injury is life-threatening.
- Contact Corporate Safety Director at 314-422-1007 for initial report, guidance on treatment or to report status if emergency medical services are required.
- Treat injury if possible. If injury cannot be treated, but is not life-threatening, the project Superintendent and Corporate Safety Director will determine what medical treatment is required.
- Follow Corporate Crisis Plan as necessary.
- Take injured to pre-arranged medical facility or contact emergency medical services as necessary for medical treatment and post-incident drug testing. Regardless of incident, near miss, injury requiring medical treatment, post-event drug testing is required.
- Secure the incident area to ensure there is no hazard exposure present to other workers and to maintain the integrity of the scene.
- Get statements from witnesses.
- Take photos of the incident scene.
- Fill out V & O Services Inc. Incident Investigation Report and send to Corporate Safety Director immediately.
- The assigned Safety Team member or the Safety Director will complete a Root Cause Investigation Report.
- As necessary, or requested by the Corporate Safety Director, the project team will assist in a Recordable Incident Debriefing as soon as practical.

Incident Investigation

Medical Only - All medical-only incidents will be reviewed by the Corporate Safety Director and the project Superintendent. This review process will be conducted on the project site. An Incident Investigation Report will be completed by the project Superintendent. This report will be forwarded to the Corporate Safety Director and Project Manager.

Recordable Accident (no lost time) - Project Manager and Project Engineer will attend the on-site investigation. The project team will complete an investigation report and present the report to the Safety Committee for review.

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Recordable (lost time) - The post incident investigation will be conducted by the project Superintendent, Corporate Safety Director, Assigned Safety Engineer, Project Manager and Project Engineer. The project team will complete an investigation report and present the report to an investigation subcommittee for review prior to forwarding to the Corporate Safety Committee.

Property Damage - For any property damage, complete an Incident Investigation – Short Form.

Near Miss - Near miss incidents are defined as an incident that could have resulted in an injury, illness, medical treatment and/or property damage. To be proactive in safety, near miss incidents need to be identified and addressed. In cases where there could have been a potential injury, equipment damage, property damage, or bad public relations, complete a Near Miss Report.

Good Catch – Good catch incidents are defined as an unsafe condition or act that was recognized, which if let unaddressed, could have resulted in an injury, property damage, or outage. This could also be a positive recognition of a good work practice or behavior which helped create a safer environment. To be proactive in safety, good catch incidents need to be identified and addressed. In these cases, complete a Good Catch Report.

Written reports must be turned in to the Corporate Safety Director within 24 hours to ensure they are filed on a timely basis with our Workers' Compensation insurance carrier and the National Council for Compensation Insurance (NCCI).

Copies of all completed Incident Reports are routed to upper management for review and comments.

OSHA REFERENCE

29 CFR Part 1904

RELATED SECTIONS

Company Vehicle and Defensive Driving (Section 43)

APPLICABLE FORMS (APPENDIX B)


Incident Investigation Report – Standard Form

Incident Investigation – Short Form

Near Miss Reporting

Good Cath Reporting

Root Cause Report

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	PPE
		Initial Issue Date	5/1/2015
PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 19 Page 1 of 2

PURPOSE & APPLICATION

OSHA requirements state the employer must provide and enforce use of the correct PPE related to the task at hand.

Due to the inherent hazards of the construction industry and in V & O Services Inc. Corporation’s commitment to providing the safest work environment possible, we have implemented a 100% PPE policy regarding hard hats, safety glasses, hi-vis outerwear, gloves, and sturdy work boots.

The preferred method of controlling hazards is to eliminate them through engineering or administrative controls. When hazards cannot be eliminated, PPE must be used to minimize risk.

PROCEDURE

Hard hats, ANSI-approved safety glasses with side shields/side protection, high visibility outerwear, gloves and sturdy work boots are the minimum requirements for ALL V & O Services Inc. Corporation project sites.

The project site is defined as: *Any area within the construction limits of the project.*

To further clarify this matter, hard hats and safety glasses are not required while in the project trailer or while in a completely enclosed company or personal vehicle.

The above items are the minimum requirements and will be enforced consistently in accordance with the V & O Services Inc. Corporation Disciplinary Policy.

Additional Requirements

While hard hats, safety glasses, hi-vis outerwear, gloves and sturdy work boots are the **minimum** requirements they do not relieve the responsibility of the project team or the individual to have the proper PPE for the specific task at hand. This PPE can include, but not be limited to:

- Face shields and/or goggles
- Hearing protection (plugs and/or muffs)
- Respirators or SCBA’s
- Gloves
- Reflective vests
- Tyvec suits
- Rain suits
- Knee pads
- Matatarsal guards
- Fall protection (harnesses & lanyards)


****Additional PPE required for work being performed will be identified on the daily PTSP****

Employee review the daily PTSP (Pre-Task Safety Plan) identifying the hazards for the project/tasks prior to beginning work. Project crew members sign their acknowledgment and awareness of required PPE on the PTSP.

Training

All employees using PPE shall receive training in PPE during New Hire Orientation. In addition, when the job, circumstances or tasks change or, if a new type of PPE is issued, retraining shall be provided. If a deficiency or improper use by the employee is noted by the employee’s supervisor(s), the employee shall receive retraining. Training shall be documented and cover the following:

- What items constitute PPE for this type of work or jobsite?

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	PPE
		Initial Issue Date	5/1/2015
PERSONAL PROTECTIVE EQUIPMENT (PPE) POLICY		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 19 Page 2 of 2

- What PPE is necessary for a given task or tasks to be accomplished by the employee or on the particular job?
- What is the minimum acceptable PPE?
- How to properly don, doff, adjust & wear PPE. PPE must be fitted to the employee correctly to be effective.
- The limitations of PPE.
- The proper care, maintenance, useful life & disposal of PPE to be used regularly.
- Awareness that there exists specialized PPE, such as respirators. If specialized PPE is required, further training shall be provided.

PPE Requirements

PPE shall be maintained in sanitary condition and in good repair. Damaged or defective PPE shall not be used and shall be replaced at no cost to the employee. The employee is required to inspect his/her PPE prior to use to ensure that PPE is not damaged.

Respiratory Protection

For duties that require respiratory protection because the hazard cannot be engineered out, employees will be required to undergo a medical evaluation, be fit tested and trained on the specific equipment in use. Employees are required to be fit tested annually, as well as undergo a review to determine if a respiratory medical re-evaluation is needed due to changes in health, stature, etc.

Corporate Office and TEAM Facility


The Corporate Office and TEAM Facility are considered project support facilities consisting of office, maintenance, storage and common areas. PPE requirements of the office will be task/hazard specific. PPE Requirements in the TEAM facility are exempt (unless a specific hazard is present) while in Green designated "Safe Zones." Mechanics must have hard hats readily available at all times while working outside of "Safe Zones."

OSHA REFERENCE

Personal Protective Equipment is referenced by the entire Subpart E of 29 CFR Part 1926.

APPLICABLE FORMS (APPENDIX B)

- Pre-Task Safety Plan (PTSP)
- Respirator Medical Evaluation (Fit Test)

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-DRUG
		Initial Issue Date	5/1/2015
DRUG & ALCOHOL POLICY		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 20 Page 1 of 2

PURPOSE & APPLICATION

V & O Services Inc. Corporation maintains a Drug & Alcohol-free workplace. V & O Services Inc. Corporation’s program is governed by the procedures of the St. Louis Construction Industry Substance Abuse Consortium.

Construction work has constantly changing conditions which pose inherent risks to our employees. Employees under the influence of drugs or alcohol pose an even greater risk to the project team members and the general public. Ensuring a drug and alcohol-free work place is imperative to providing a safe working environment to these employees and the public.

In accordance with the consortium procedures:

All applicants for employment and employees of V & O Services Inc. Corporation, as a condition of employment or continued employment, who haven’t taken a drug test within 120 days of employment, will be required to submit to and pass a drug and/or alcohol screening test.

Employees of V & O Services Inc. Corporation will be randomly tested.

Employees will be subject to a post-accident test based on their involvement in an incident.

Tests for reasonable cause may be required in specific situations. In the event that a supervisor suspects that an employee is working under the influence of a substance, a Reasonable Suspicion Document will be filled out by two witnesses and faxed or provided to the testing agency. The testing agency representative will report to the jobsite to conduct testing of the suspected substance. **TESTING FOR SUSPICION WILL ONLY BE CONDUCTED WITH THE INVOLVEMENT OF THE V & O SERVICES INC. SAFETY DIRECTOR OR V & O SERVICES INC. HUMAN RESOURCES MANAGER (OR OTHER DESIGNATED PROGRAM COMMUNICATOR)!** All Supervisory and management personnel will receive “Reasonable Suspicion” training.

Approximately 5% of company employees will be selected, randomly, for tests on a monthly basis.

Approximately 60% of employees will be tested per year.

PROCEDURE

Self Referral

If an employee feels that he or she has an alcohol or drug problem, it is important that the condition be diagnosed and proper treatment followed.

V & O Services Inc. Corporation maintains an Employee Assistance Program (EAP), which can provide confidential

assistance and direction to an employee with such problems.

Craft workers also have access to their own EAP through each respective local union.

For detailed information about the EAP service, contact the Human Resources Manager.

Failed Test


If an employee should fail an alcohol or drug screening, the Corporate Safety Director (or designated Drug Communicator) will direct the employee to the appropriate EAP.

It is the employee’s responsibility to contact the EAP and to follow an appropriate treatment program.

All information passed between the employee and representative of the EAP is completely confidential.

The Corporate Safety Director has the right to determine if the employee has contacted the EAP and maintained appointments and is successfully progressing toward “reinstatement.”

As part of the “reinstatement process” the employee will be required to pass a drug and/or alcohol screening; completion of this process makes the employee eligible for re-employment. Completion of the reinstatement process only makes an employee eligible for re-employment; due to production requirements positions will be filled as necessary and could result in a position no longer being available.

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		Initial Issue Date	5/1/2015
DRUG & ALCOHOL POLICY		Revision Date:	3/19/2018
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		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 20 Page 2 of 2

Test Refusal:

Refusing to take a pre-employment, random or post-incident drug or alcohol test automatically classifies as a positive test.

Disciplinary Measures

Pre-employment: Applicants who fail or refuse a drug and/or alcohol screening will not be considered for employment.

Self-Referral: There will be no disciplinary measure for first-time self-referred employees.

Failed Test

First Offense – employees must complete the “Reinstatement Process” in accordance with the AGC Construction Consortium Guidelines, which includes drug consultation with an Employee Assistance Program Drug Counselor, completion of recommended course of treatment, retesting at employees expense and achievement of negative test result. REMEMBER - completion of this process ONLY makes the employee eligible for re-employment!

Second Offense – employees testing positive for a second time are ineligible for re-employment with V & O Services Inc.
for a period of two years.

Third Offense – employees testing positive for a third time are ineligible for re-employment with V & O Services Inc. Extreme circumstances: V & O Services Inc. Corporation retains the right to terminate employment at any time for involvement in acts that do not promote a safe work environment.

Return to work: All work assignments are based on availability of work. Completing the “reinstatement process” and disciplinary measure does not guarantee work availability.

OSHA REFERENCE


Employees under the influence of drugs or alcohol pose a greater risk to other members of the project team and the public. Under Subpart C, 29 CFR 1926.20(a) “...no contractor...shall require any [employee] to work in surroundings...which are hazardous or dangerous to his health and safety.”

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Reasonable Suspicion

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-JSA
		Initial Issue Date	5/1/2015
PRE-TASK SAFETY PLAN		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 21 Page 1 of 2

PURPOSE & APPLICATION

Many job related injuries occur because employees are not trained in the proper job procedures. This is true particularly for new employees. One way to prevent these injuries is to conduct a job safety analysis. This has proven to be an effective tool for eliminating or minimizing workplace hazards. The “safety Production Huddle” form is V & O Services Inc.’s Daily Pre-Task Safety Plan (PTSP) process.

Effectively planning each day’s work and completing the Pre-task safety plan is an excellent tool for training employees to plan their work activities effectively and in a safe manner. A PTSP form can also be useful in an accident investigation. By referring to the completed PTSP, a supervisor can determine if the analysis must be reviewed or if the worker failed to follow recommended procedures.

The Pre-Task Safety Plan has three functions:

Provides written documentation of work to be performed and the safest manner for performing a task or job. Serves as a method for training, communicating, and identifying the work to be performed each day and hazards associated with the tasks.

Identifies and documents the means for reducing or eliminating those hazards.


PROCEDURE

The primary steps in completing a job safety analysis are:

1. Determine the work processes to be planned and analyzed the afternoon of the day PRIOR to the work.
2. Ensure that all checklists and permits have been completed for work to be performed.
3. Determine accomplishment of the previous day’s goals.
4. Identify the work to be performed.
5. Determine how it will be accomplished, sequenced and coordinated with other trades.
6. Determine who will be involved; both V & O Services Inc. employees and Subcontractor employees.
7. Determine specifically what tools and materials will be needed.
8. Plan use of equipment that will be needed for the work such as cranes, concrete pump, other material handling equipment (lull), generators, compressors, power washer, etc. and the timeframe in which they will be used.
9. Establish goals for this work period.
10. Determine fallback work or other work that will take place if the planned work is completed ahead of schedule or the planned work sequence is altered.
11. Assess the hazards associated with each step.
12. Recommend safe work procedures, controls, and safeguards to minimize or eliminate the hazards.
13. Employee shall acknowledge by signature that they are injury free at the end of each shift.

Use the PTSP worksheet to document your observations and employee comments.

After listing all job elements, identify the hazards with the work, tools, handling of materials, and equipment. Identify all actual and potential hazards whether they result from an unsafe act, unsafe condition or both.

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-JSA
		Initial Issue Date	5/1/2015
PRE-TASK SAFETY PLAN		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 21 Page 2 of 2

After identifying hazards, develop recommended procedures and safeguards. Determine whether the job can be performed in another way to eliminate hazards or whether safety equipment and precautions are needed to reduce the hazards. Describe the recommended procedures or safeguards in detail.

After the PTSP form is completed, and prior to the start of work, review it with all members of the crew performing the work and have all employees acknowledge by signature. This is to ensure understanding of the work to be performed, how it will be performed and the hazards associated with it. At the conclusion of the task or shift, all employees shall sign off the PTSP form injury and incident free if there are no reports otherwise.

OSHA REFERENCE


OSHA does not specifically reference the JSA process, however, paragraph 1926.21(b)(2) states “The employer shall instruct each employee in the recognition and avoidance of unsafe conditions...to control or eliminate any hazards or other exposure to illness or injury.” The JSA process meets this requirement by helping to recognize, identify and control hazards associated with a particular task.

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Pre-Task Safety Plan (PTSP)

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-TOOLS
		Initial Issue Date	5/1/2015
HAND, POWER, PNEUMATIC & POWDER-ACTUATED TOOLS		Revision Date:	12/01/15
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 22 Page 1 of 3

PURPOSE & APPLICATION

The purpose of this policy is to inform employees of any required training and safe work practices for using hand, power, pneumatic and powder-actuated tools.

PROCEDURE

Safe Work Practices:


HAND TOOLS

- Tools must be used for their intended use. Example of improper use may be using a screwdriver as a chisel, which may cause the tip of the screwdriver to break and fly, hitting the user or other employees.
- Worn or damaged tools or tools not in compliance with regulations shall be tagged and removed from service.
- Wrenches, including adjustable, pipe end, and socket wrenches shall not be used when jaws are sprung to the point that slippage occurs.
- Impact tools such as drift pins, wedges, and chisels, shall be kept free of mushroomed heads.
- The wooden handles of tools shall be kept free of splinters or cracks, shall be kept tight in the tools, and shall not be taped.

POWER TOOLS

- Never carry a tool by the cord or hose.
- GFCIs should be used with all construction power tools.
- All prongs should be in place on plugs; do not use if even one prong is missing.
- Never yank the cord or the hose to disconnect it from the receptacle.
- Keep cords and hoses away from heat, oil, and sharp edges.
- Disconnect tools when not in use, before servicing, and when changing accessories such as blades, bits, and cutters.
- All observers should be kept at a safe distance away from the work area.
- Secure work with clamps or a vise, freeing both hands to operate the tool.
- Avoid accidental starting. The worker shall not hold a finger on the switch button while carrying a plugged in tool.
- De-energize power tools before maintenance.
- Do not refuel a power tool while it is in use or powered on.
- Use handles if provided.
- Tools shall be maintained with care. They shall be kept sharp and clean for the best performance. Follow instructions in the User's Manual for lubricating and changing accessories.
- Be sure to keep good footing and maintain good balance.
- The proper apparel shall be worn. Loose clothing, ties, or jewelry shall be removed or secured as they can become caught in moving parts.
- All portable electric tools that are damaged or not in compliance with regulations shall be removed from use and tagged "DANGER DO NOT USE" and dated.
- Tools shall be operated with proper guards in place.

PNEUMATIC TOOLS

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-TOOLS
		Initial Issue Date	5/1/2015
HAND, POWER, PNEUMATIC & POWDER-ACTUATED TOOLS		Revision Date:	12/01/15
		Revision No.	1
		Next Review Date:	4/1/2021
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- Eye protection is required and face protection is recommended for employees working with pneumatic tools.
- Safety toe boots and metatarsal protection is required at all times when using jackhammers.
- When working with noisy tools, such as jackhammers, proper hearing protection is required.
- When using pneumatic tools, employees shall check to see that they are fastened securely to the hose to prevent them from becoming disconnected. A short wire or positive locking device “whip check” attaching the air hose to the tool will serve as an added safeguard.
- A safety clip or retainer shall be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel.
- Air hoses should have secured connections or whip checks.
- Screens shall be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers, or air drills.
- Compressed air guns shall NEVER be pointed toward anyone. Users shall NEVER “dead-end” it against themselves or anyone else.
- Do not point pneumatic tools at other people or yourself.
- Pneumatic tools not in compliance with regulations, damaged, worn, or with missing guards, shall be removed from use and tagged “DANGER DO NOT USE” and dated.
- Efforts shall be made to use pneumatic tools and equipment designed to reduce or eliminate worker exposure to silica dust.
- Where a worker may be exposed to silica dust, they will comply with the provisions of the Respirator Program.

POWDER-ACTUATED TOOLS

- Operation of power-actuated tools present unique hazards and requires Powder-Actuated Tool Operator Certification.
- Never point powder-actuated tools at anyone.
- Identify and control line of fire hazards for the public and employees working with the tools on the daily PTSP.
- Establish Controlled Access Zones for areas where powder-actuated tools are in operation.
- Additional PPE is required when using these tools to protect against noise, line of fire hazards, projectiles, eye and face injuries.
- Powder-actuated tools not in compliance with regulations, damaged, worn, or with missing guards, shall be removed from use and tagged “DANGER DO NOT USE” and dated.


Hazard Recognition:

Tool Hazards

Each employee must be familiar with the hazards associated with the tool being used whether it is a hand tool, power tool, pneumatic or powder-actuated. Hazards will be identified in daily training through the PTSP.

Guards (Power, Pneumatic, Powder-Actuated Tools)

Safety guards should never be removed when a tool is in use. Guards protect against hazards such as point-of-operation hazards, in-running nip points, rotating parts and flying chips and sparks.

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		Initial Issue Date	5/1/2015
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		Next Review Date:	4/1/2021
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Safety Switches (Power Tools)

A safety switch is a constant pressure switch or control that will shut off the power when pressure is released.

Electric Shock (Power Tools)

Some of the chief hazards of electric power tools burns and slight shocks. For protection, tools shall either have a 3-wire cord with ground and be grounded, double double-insulated or be powered by a low-voltage isolation transformer.

Additional PPE (Powder-Actuated)

Each employee must be aware of the tool hazards and needs for additional PPE.

Overhead Work

Anytime tools or work operations require work at face height, overhead or over other employees, additional protective systems, PPE or barricading will be required.

Line of Fire

All tools have the potential for line of fire hazards. These hazards should be identified on the PTSP and covered in the annual TBT training topics.

Training:

- A fire extinguisher should always be accessible when using power tools. Employees should receive training on the P.A.S.S. method of using a fire extinguisher.
- Powder-Actuated Tool Operator Certification for powder-actuated tools.
- General construction hazard training in OSHA 10 and 30-hour training, daily PTSP and weekly TBT topics.

Inspection:

All tools, hand or power, should be inspected prior to each day’s use and removed from service if damaged. Specific defects to look for can be found in the safe work practices listed above.

OSHA REFERENCE


29 CFR 1926 Subpart I Tools – Hand and Power

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-ELECTOOLS
		Initial Issue Date	5/1/2015
GFCI / ELECTRICAL TOOLS INSPECTION PROGRAM		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 23 Page 1 of 2

PURPOSE & APPLICATION

OSHA requires that ground fault circuit interrupters (GFCI) be placed on all temporary power circuits or an assured grounding program be in place for all tools and cords. V & O Services Inc. Corporation requires that GFCI's are to be used on all construction equipment, whether it is a temporary or permanent power source.

Using GFCI's can prevent shock or electrocution in the moist and wet construction environments we typically work in.

GFCI's and electrical tools will be inspected prior to each use and periodically while on projects.

PROCEDURE

GFCI check prior to use:

Employees will test all GFCI's by pushing the test button.

When the GFCI trips, the employee will push the reset button.

When the reset button holds, the GFCI is ready for use.

GFCI Periodic Inspections:

GFCI's will be spot-checked during each weekly inspection.

The person conducting the job-safety audit report will ensure GFCI's are in use on all power and spot check the test buttons according to the above.

Tools Inspection prior to use:

Employees will ensure that all electrical tools and cords have been inspected for cuts, gouges, breaks, missing prongs, loose/missing guards, damaged plugs or exposed wires.

The employee will also ensure the tool functions properly.

Quarterly Tool Inspection:

At the beginning of each quarter, the Superintendent (or designated foreman) will conduct an inventory of all tools on the jobsite against the latest tools report. During this time the Superintendent will also inspect tools and cords for serviceability.


IF an OWNER/CLIENT requires an Assured Grounding Program is maintained on all equipment. The color-coding system is as follows:

Winter	White	January, February, March
Spring	Green	April, May, June
Summer	Red	July, August, September
Fall	Orange	October, November, December

When the tool has been verified to be in good working condition, it will be labeled with the appropriate color tape on the male end of the plug. Any defective tools or cords will be returned to the TEAM Facility immediately. The TEAM Facility will also conduct inspections of all tools, cords and GFCI's in their inventory following the same procedures above.

OSHA REFERENCE

1926.404(b) 1 and 2 in Subpart K of 29 CFR Part 1926.


	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-ELECTOOLS
		Initial Issue Date	5/1/2015
GFCI / ELECTRICAL TOOLS INSPECTION PROGRAM		Revision Date:	3/19/2018
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RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-ELECAWARE
		Initial Issue Date	5/1/2015
ELECTRICAL SAFETY AWARENESS		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	3/19/2018
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 24 Page 1 of 3

PURPOSE & APPLICATION

The purpose of this policy is to inform employees of any required training and safe work practices for working with or near electrical hazards.

This policy applies to workers including electronic engineers, electricians, machine operators, mechanics, repairmen, painters, riggers and material handlers and welders among others.

PROCEDURE

Safe Work Practices:

ELECTRICAL AWARENESS

- In addition to the minimum required PPE, proper hazard specific PPE must be worn while performing electrical work or working near energized lines or equipment.
- Necessary PPE for electrical or power-related tasks should be identified on the daily JSA. The PPE and work practices identified during the JSA are to protect employees from either direct or indirect contact with energized systems, electrical equipment, overhead lines or circuitry.
- Clothing and apparel used during electrical work must be non-conductive or appropriately covered or wrapped with non-conductive material. If you have questions, please contact the safety officer.
- Prior to beginning work, energized systems or equipment shall be de-energized and disconnected from the electrical or power source; system or equipment to be isolated must be locked and tagged out using V & O Services Inc. LOTO procedures.
- When working on or near exposed, de-energized parts, employees will assume that those parts are live and use appropriate safety precautions.
- If work is to be performed on a system and the employee cannot determine whether a line or equipment is energized or de-energized, employee shall assume that it is live and energized and use appropriate safety precautions including obtaining an Energized Electrical Work Permit from the V & O Services Inc. Safety Department. Only qualified persons may work on energized systems or parts.
- Parts of equipment or circuits that have been de-energized but not locked and tagged out, will be considered to be energized.
- Required clearances: Maintain a 10 feet standoff distance from overhead powerlines unless other precautions are taken. Working closer than 10 feet to power lines requires clearance from the Safety Team. Safety Team shall determine if work may be done within the clearance required according to OSHA standards as follows:

“Unqualified persons shall not approach overhead lines of 50kV or below any closer than 10 feet. For lines of 50kV or above, employees shall remain 10 feet plus 4 inches distant for every 10kV over 50kV. A person may not approach any closer than the above reference distances with a conductive tool, object, equipment or vehicle that he/she may be using.”

- In confined spaces or enclosed areas or where required clearances cannot be maintained, insulated materials, protective barriers or protective shields may be erected or lines may be de-energized and grounded. Consult the safety department if clearance cannot be maintained.
- Inspect all equipment and cords prior to each use. Tag and remove any frayed or damaged electrical cords or tools with frayed or damaged cords.
- Energized systems, electric tools and equipment, and systems with potential stored energy shall be de-energized and disconnected from the energy source prior to beginning work on such systems.



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CORPORATION Safety
Management System

Doc No: TC-ELECAWARE

Initial Issue Date: 5/1/2015

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Revision No. 1

Next Review Date: 3/19/2018

ELECTRICAL SAFETY AWARENESS

Preparation: Safety Mgr

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- LOTO tags shall contain a statement prohibiting unauthorized removal of the tag and/or operation of the system that is disconnected.
- An electric shock or other unintentional exposure to released energy constitutes an incident and must be reported to the superintendent.
- Illumination shall be provided that enables qualified employees to enter spaces with potential or real electrical hazards and perform work safely. No employee shall enter a hazardous space without appropriate light.
- All employees to know emergency procedures in the event of an electrical shock or fire.
- No wooden or aluminum ladders may be used in proximity to overhead lines. Use ladders with non-conductive side rails such as fiberglass.

LOTO Procedures

- LOTO Procedures will be followed when employees work on, repair, install, or relocate equipment, power lines, outlets, circuits, gas pipes or water pipes to ensure that employees are not subjected to hazards associated with the sudden, unexpected release of electrical power or other types of stored energy.
- See section titled Lock Out / Tag Out Safety Procedures.

Approach Distances for Qualified Employees

- When performing tasks, qualified employees must adhere to the approach distances outlined in TABLE S-5 per OSHA regulations.


TABLE S-5 – APPROACH DISTANCES FOR QUALIFIED EMPLOYEES – ALTERNATING CURRENT	
Voltage range (phase to phase)	Minimum approach distance
300V and less	Avoid Contact
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm)
Over 750V, not over 2kV	1 ft. 6 in. (46 cm)
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm)
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm)
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm)
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm)
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm)

Hazard Recognition:

- Fire Hazards
- Electric Shock
- Stored Energy Release

Training:

- Employees in occupations or assigned to tasks that expose them to electrical hazards will be trained to recognize those hazards, understand the potential for injury, identify appropriate PPE, and understand safe work practices related to energized and de-energized electrical hazards. Training shall be documented and maintained for the duration of the employee’s employment.

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- At each jobsite, each employee should receive a Site Specific Orientation which will inform them of electrical hazards, LOTO procedures, appropriate PPE, the presence of overhead lines and clearance requirements.
- Only qualified persons may work on energized equipment. Such person shall be fully trained and capable of working safely on energized circuits, familiar with appropriate PPE, techniques, tools and equipment; aware of insulating and shielding materials and tools.

Inspection:

- Electrical equipment and cords are to be inspected by employees prior to use, including GFCIs.
- LOTO equipment, including locks and tags, are to be inspected by employees prior to use.
- Quarterly Tool Inspections for Assured Grounding Program; see GFCI Program.

OSHA REFERENCE


1910.332 of Subpart S 29 CFR Part 1910
1910.333 of Subpart S 29 CFR Part 1910

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

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Purpose

The purpose of this program is to ensure the safe use of hazardous chemical substances and to comply with the requirements of OSHA HCS 2012.

Introduction

In 2012, OSHA revised the Hazard Communication Standard (HCS) to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this Hazard Communication Program (HCP) has been revised to comply with the requirements of the OSHA HCS 2012.

It spells out how V & O Services Inc. will inventory chemicals stored and used, obtain and use Safety Data Sheets, maintain labels on chemical substances and train employees about the hazards of chemicals they are likely to encounter on the job.

Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- In addition to the program, other information required as part of our hazard communication effort is available to workers upon request.
- Asking to see this information is an employee's right.
- Using this information is part of our shared commitment to a safe, healthy workplace.

Scope

This program is applicable to all V & O Services Inc. employees who may be exposed to hazardous chemical substances. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers V & O Services Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.


Responsibilities

A written hazard communication program be developed, implemented and maintained at each workplace. A written hazard communication program shall be developed, implemented and maintained at each workplace that describes how labels and other forms of warning, Safety Data Sheets and employee information will be met.

Safety Manager or Designee

The Safety Manager, or designee, is responsible for administering the hazard communication program. This person is also responsible for:

- Reviewing the potential hazards and safe use of chemicals.
- Maintaining a list of all hazardous chemicals and a master file of SDSs.
- Ensuring that all containers are labeled, tagged or marked properly.

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- Providing new-hire and annual training for employees.
- Maintaining training records.
- Identifying hazardous chemicals used in nonroutine tasks and assessing their risks.
- Informing outside contractors who are performing work on V & O Services Inc. property about potential hazards.
- Reviewing the effectiveness of the hazard communication program and making sure that the program satisfies the requirements of all applicable federal, state or local hazard communication requirements.

Employees

- Employees are responsible for following the requirements in the Hazard Communication Program.
- Any employee who transfers any material from one container to another is responsible for labeling the new container with all required information.
- All employees are responsible for learning the requirements of this section and for applying them to their daily work routine.
- Identifying hazards before starting a job.
- Reading container labels and SDSs.
- Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers.
- Using controls and/or personal protective equipment provided by the company to minimize exposure.
- Following company instructions and warnings pertaining to chemical handling and usage
- Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage and replacement.
- Knowing and understanding the consequences associated with not following V & O Services Inc. policy concerning the safe handling and use of chemicals.
- Participating in V & O Services Inc. training.

Procedure

List of Hazardous Chemicals

V & O Services Inc. shall maintain a list of hazardous chemicals on the job site. A list of the hazardous chemicals known to be present using an identity that is referenced on the appropriate Safety Data Sheet shall be maintained.


The Hazardous Chemical List is updated as necessary and at least annually by the Safety Manager or their designee. The Hazardous Chemical List must be available for review upon request.

Safety Data Sheets (SDS)

SDSs must be obtained for each required chemical. Chemical manufacturers are responsible for developing SDSs. COMPANY shall have a SDS for each chemical used.

The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Safety Data Sheet in a timely fashion is prohibited.

SDSs are to be maintained in a readily accessible location to employees. SDSs shall be maintained and readily accessible in each work area. SDSs can be maintained at the primary work site. However, they should be available in case of an emergency. SDS must be made available, upon request, to employees, their designated representatives, the Assistant Secretary & the Director.

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The Safety Data Sheet must be kept in the SDS library for as long as the chemical is used by the facility. Electronic access (telephone, fax, internet, etc.) may be used to acquire and maintain SDS libraries and archives.

The Manager is responsible for seeing that the Chemical Inventory List inventory is maintained, is current and is complete. He/she will review Chemical Inventory List at least annually. When a hazardous material has been permanently removed from the work place, its SDS is to be removed from the Chemical Inventory List.

SDS' for hazardous materials to which V & O Services Inc. employees have been exposed must be maintained after the employee leaves the employment of V & O Services Inc..

Methods to be Used to Inform Employees of the Hazards of Non-Routine Tasks

The methods that V & O Services Inc. will use to inform employees of the hazards of non-routine tasks (i.e., the cleaning of reactor vessels, etc.) and the hazards associated with chemicals contained in unlabeled pipes in their work areas include:

- Conducting a Job Hazard Assessment (PTSP).
- Employees will be advised of methods and special precautions, PPE and the hazards associated with chemicals and the hazards associated with chemicals contained in unlabeled pipes in their work areas.
- In the unlikely event that such tasks are required, the supervisor, or designee, will provide a SDS for the involved chemical.

The Use and Care of Labels and Other Forms of Warning

Container labels should contain the following information:

- Product identifier
- Signal word
- Hazard statement
- Pictogram(s)
- Precautionary statement(s), and
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party.

The Manager will ensure that all hazardous chemicals used or stored in the facility are properly labeled.


Damaged labels or labels with incomplete information shall be reported immediately.

Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area throughout each work shift.

If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.

V & O Services Inc. will use the GHS labeling system for secondary containers.

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label.


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If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled.

Received from vendors that are not properly labeled must be rejected.

Pictograms and Hazards

Health Hazard  <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	Flame  <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	Exclamation Mark  <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder  <ul style="list-style-type: none"> • Gases Under Pressure 	Corrosion  <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	Exploding Bomb  <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle  <ul style="list-style-type: none"> • Oxidizers 	Environment (Non-Mandatory)  <ul style="list-style-type: none"> • Aquatic Toxicity 	Skull and Crossbones  <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

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Example Label



Multi-Employer Job Sites and/or Multi Work Site

The following specific methods for providing other employer information concerning hazardous chemicals at job sites, methods of providing SDS sheets, methods of precautionary measures to be taken and methods of providing information on labeling systems:

Multi-Work Sites

Where employees must travel between work places during a work shift (multi job sites), the written program may be kept at a primary job site. If there is no primary, then the program should be sent with employees.


Multi-Employer Job Sites

A pre-job briefing shall be conducted with the contractor prior to the initiation of work on the site.

- During this pre-job briefing, contractors shall notify V & O Services Inc. and present current copies of Safety Data Sheets and label information for every hazardous chemical brought on-site.
- V & O Services Inc. shall notify and provide required SDS and label information for all hazardous chemicals the contractor may encounter on the job.
- The facilities labeling system and any precautionary measures to be taken by contractor during normal conditions and emergencies shall be addressed.
- By providing such information to other employers, V & O Services Inc. does not assume any obligations that other employers have for the safety of their employees.

Training

Employees shall be provided with information and training. Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and safety data sheets.

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Additional training will be provided whenever a new chemical hazard is introduced into the work area. To reinforce the importance of handling chemicals properly when performing new or non-routine tasks supervisors will conduct supplementary training as needed.

Formal training will be conducted by facility employees or individuals who are knowledgeable in the Hazard Communication program.

The Hazard Communication Program documented training shall, as a minimum, include:


- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry).
- Operations in the work area where hazardous chemicals are present.
- Location and availability of the hazard communication program, chemical inventory list and SDSs.
- Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released.
- Explanation of the labels received on shipped containers.
- Explanation of the workplace labeling system.
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information.

The Manager shall ensure records of employee training are maintained.

Implementation Requirement

Per OSHA Requirements

Effective Completion Date	Requirement(s)	Who
December 1, 2013	Train employees on the new label elements and safety data sheet (SDS) format.	Employers
June 1, 2015* December 1, 2015	Compliance with all modified provisions of this final rule, except: The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label	Chemical manufacturers, importers, distributors and employers
June 1, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers
Transition Period to the effective completion dates noted above	May comply with either 29 CFR 1910.1200 (the final standard), or the current standard, or both	Chemical manufacturers, importers, distributors, and employers

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PURPOSE & APPLICATION

The Lockout/Tagout procedure applies to anyone working on or near an active process, equipment, machinery, energy source or utility.

The purpose of Lockout/Tagout is to assure that employees are protected from unattended machine operation or unintended release of energy which could cause injury when they set up, adjust, repair, service, install or perform maintenance work on equipment/machinery. Injuries may occur from potential hazardous energy sources such as unexpected startup or releases of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, kinetic, radioactive or other potential hazardous energy sources or during blinding and opening of process equipment and / or piping to facilitate maintenance activities.

Lockout is the preferred method of isolating machines or equipment from energy sources. On devices or equipment where lockout cannot be accomplished, tagout is the acceptable alternative. The tag should be placed at a point where it will be highly visible on the energy control device.

When a tagout device is used, the tagout device shall be attached at the same location that a lockout would normally have been attached. The tagout program must provide a level of safety equivalent to that obtained by using the lockout program.

Energy Isolation


Hazardous energy may exist as stored energy in several circumstances. Stored energy must be relieved prior to blocking and installing lockout devices. The energy generating mechanism must be defeated to remove the possibility of regeneration. Examples of stored energy are springs, elevated components, capacitors, contained pressure, and flywheels.

NOTE: Capacitors must be discharged, shorted, and grounded in addition to lockout of the source of energy by a qualified person.

PROCEDURE

All employees subject to working on processes, machinery or energy sources will be provided with locks, lockout devices and tags that specifically identify them as the individual responsible for lockout/tagout of the machine, device or energy source to which the tag is attached.

1. When any work around or to a utility or piece of equipment is to be done, all parties must clear work through the V & O Services Inc. Corporation Superintendent who will approve or disapprove all requests and issue a tag/permit. Authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy being controlled and knowledge of the means to control the energy.
2. Parties working in the area will be notified by those conducting the lockout, of the extent of work to be performed and the effect of such work to the associated parties.
3. Disconnect all equipment and/or sources to be sure they are off. Use proper established procedures to shutdown systems or turn off equipment. Process equipment/systems shall be shut down and prepared for mechanical work by the affected person(s) who has the responsibility for operating that equipment. All energy sources must be identified and energy isolation devices installed.

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4. Release any residual energy such as springs, unsecured machine parts, etc. Lockout energy source using lock and tag. The authorized person must physically identify the energy sources associated with and the isolation devices/techniques required to achieve isolation for his/her job.
5. Verify energy source isolation by retesting to make sure equipment or energy source is off.
6. Perform necessary permitted work.
7. Before putting back into service, check to be sure all safety devices such as guards are in place and functional. Then check to make sure all tools, parts, etc., are removed.
9. Remove tags/locks.
10. Restore power and check to see that everything is functional.

Type of Devices

All locks for the lockout program should be of substantial durable construction.

All tags shall warn against hazardous conditions if the machine or equipment is energized and shall include a warning such as: "Do not start, do not open, do not close, do not energize, and do not operate." The tag shall also identify the individual that has placed the lock or tag and the date it was placed.

General Employee Responsibility

All employees and subcontract personnel are to be familiar with the lockout/tagout process and the prohibition against removing a lock or tag without authorization. Attempts to restart or re-energize machines which are locked out or tagged out, without the authorization of the individual that has placed the tag, will result in disciplinary procedures.

Shift or Personnel Change

At the time of a shift change, the individual or individuals currently having lockout/tagout authority shall meet with and inform the incoming individual or crew of the status of the de-energized locked out/tagged out equipment.

The lock and tag may be removed and replaced by the oncoming crew when:

The current status of the repair or maintenance project is explained to the oncoming shift personnel, inspection of the device is completed to assure that employees are away from the area


The new crew is to implement their lockout/tagout procedures and test sequences, to assure that the equipment is de-energized and securely locked out/tagged out in the off position.

Training

V & O Services Inc. Corporation shall train employees on how to lock, tag, and try according to proper procedure. The training should include information about the types and degrees of hazards the employee will be exposed to at work. LOTO Training and retraining shall be documented. V & O Services Inc. must maintain the trainee's name, date, and training content. Retraining will be required when there is a change in energy control procedures or a new hazard has been introduced into the work area.

V & O Services Inc. shall audit lockout procedures at least once per year for compliance with this procedure and modify his/her activities accordingly.

OSHA REFERENCE

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29 CFR part 1926, Subpart K paragraph 1926.417

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Lock Out / Tag Out Permit

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PURPOSE & APPLICATION

This policy applies to all work in any area that meets the following definition of a confined space. A confined space is any area:

- Not designed for human occupancy
- That has restricted access (entry and exits)
- That may have or has potential to develop a hazardous atmosphere

Confined space work can be hazardous in itself, but the difficulties associated with accessing endangered employees can lead to catastrophic results. Properly identifying confined spaces, planning for work, and preparing for emergencies can limit the risk of these catastrophic events.

Confined spaces can be identified as:


1. Permit Required: contains or has the potential to contain any serious safety or health hazard to include entrapment, engulfment, hazardous atmosphere, etc.
2. Non-permit required: does not contain or have potential to contain any hazard capable of causing death or serious physical harm.

These areas may include:

- Sewers/manholes
- Basements/crawl spaces
- Utility chases
- Storage areas
- Tanks
- Bins (grain)
- Industrial freezers/refrigerators
- Elevator shafts
- Low-lying areas (pools or sub basements)
- Excavations
- Sump areas

Any of the following conditions may be present in a confined space:

1. Oxygen-deficient atmosphere:
 - Less than 19.5% oxygen (O₂) is not suitable for unassisted breathing.
 - Oxygen level can be reduced by the work being done (i.e. welding or painting).
 - Oxygen can be displaced by another gas such as nitrogen or carbon dioxide.
2. Flammable atmosphere:
 - Created by oxygen in the air plus a flammable gas, vapor, or dust in the proper mixture.
 - Addition of a source of ignition will result in an explosion.
3. Toxic atmosphere - toxic substances can come from several sources:
 - The product previously stored in the space.
 - The work being performed or product being used.
 - Leakage into a confined space from adjacent areas.
 - Animal or other biological decay.

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PROCEDURE

Any personnel entering or supporting confined space work must have proper training. Training shall prepare employees for their specific responsibility. Training requirements shall meet those described in OSHA 29 CFR 1910.146 and 29 CFR 1926.21. Confined Space Entry Training and Confined Space Entry Attendant Training shall be documented. The completed Confined Space permits at V & O Services Inc. shall be reviewed annually by the safety officer and the confined space program and/or permit revised if necessary.

Confined Space Entry Training will be provided prior to assignment to all employees entering a confined space. Confined Space Entrants shall have documented training prior to entering a confined space or when a change in duties, location, special circumstances or the presence of a new hazard is created. Confined Space Entry Training shall be required every three years and provided to any employees who demonstrate unfamiliarity with proper procedure.

Entry into confined spaces or permit-required confined spaces is a non-routine operation and requires consultation with the safety team prior to entry.


Duties of Entrant

- Review permit
- Wear protective clothing
- Use protective equipment
- Pay attention to own physical reactions
- Maintain communications with attendant
- If the entrant senses any reaction to the environment, he or she should signal the attendant for assistance, and leave the confined space immediately

Duties of Attendant

- Review permit
- Monitor occupants
- Keep unauthorized people out of confined space
- Maintain continuous communication with the entrant
- Make sure ventilation equipment is working
- Monitor atmospheric testing equipment
- Attend to the lifeline attached to the entrant
- Attend to the airline, if used
- Remain alert for danger
- Watch for hazards
- Maintain clear access
- Order evacuation, if necessary
- Call for emergency assistance, if needed
- Remain at entry point unless relieved by another trained attendant

Any entry to a permit-required confined space must utilize V & O Services Inc. Corporation's Confined Space Entry Permit. Site Specific Permits may be utilized in lieu of V & O Services Inc.'s Confined Space Entry Permit where special hazards exist such as testing required for more than 4 gases or substances or more than two entrants are required.

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Duties of Entry Supervisor

Prior to any entry into a confined space, an entry supervisor or safety officer shall:

- Assess the confined space for hazards and determine if the space is a permit-required confined space or a non-permit required confined space.
- Determine the existence of any external hazards (such as vehicle traffic, pedestrians or other external conditions like flooding or other contract workers in the area) which might impact the confined space. Provide any necessary barricades or guardrails or signage to keep passersby or other workers out of the confined space.
- Coordinate entrance of subcontractors or others performing work in the confined space and ensure that work being performed by multiple parties does not cause additional hazards.
- Complete the Confined Space Entry Permit if required.
- Post permit with owner/clients and at confined space entrance with the assigned Attendant.
- Cancel or terminate permit if changes occur making the space unsafe. (Unless canceled, confined space permits expire as noted on the permit.)
- Verify the availability of rescue equipment, rescue services, and a communication method for summoning emergency rescue.
- Ensure that all safety equipment required for safe entrance and work inside a confined space is available.

All V & O Services Inc. Corporation personnel entering a permit-required confined space will observe the following procedures and requirements:

1. Air supply system to adequately ventilate a confined space shall be properly designed and of the positive flow type. Air monitoring shall be periodically conducted to ensure proper ventilation.
2. Solvents and atomized coating particles are generally heavier than air and will tend to settle and concentrate in the lowest parts of confined areas. Therefore, in designing a ventilation system for these areas, particular attention should be paid to the lowest and most remote spots.
3. Air monitoring before entry shall include one or more of the following tests:
 - i. Oxygen (O₂) level.
 - ii. Combustible vapors (LEL).
 - iii. Toxic vapors (solvents/hydrocarbons/H₂S).
 - iv. Carbon Monoxide (CO).
 - Each piece of monitoring equipment must be examined daily to verify that it is in good condition and ready for use.
 - Entrants or their representatives may ask to review results or participate in air monitoring at any time before entry or after periodic air monitoring.
 - Exact procedures for calibrating and checking the testing equipment for airflow are contained in the instrument's manufacturer's instruction sheets.
 - Please contact the TEAM Facility if there are any questions regarding the condition or calibration of monitoring equipment.
4. Additional tests shall be taken during the shift if it is anticipated that air quality may change.

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5. Tests must be conducted prior to beginning work, daily and at each shift, by a supervisor familiar with the proper operation of the air-monitoring equipment.
6. The criteria for determining if a tank atmosphere is safe to enter without the use of an air-supplied respirator (non-hazardous) are as follows:
 - Oxygen (O₂) is greater than or equal to 19.5%.
 - Combustible vapors are less than or equal to 10% of the lower explosive limit (LEL).
 - Toxic vapors are less than or equal to the values noted per the Confined Space Entry Permit.
 - Carbon Monoxide (CO) is less than 35 ppm.
7. Secure machinery, processes or energy sources in accordance with this manual's Lockout / Tagout section.
8. A "stand by" worker attendant shall be on the outside of a confined space and shall be in constant visual or voice contact with workers inside. Attendants shall monitor only one space at a time.
9. A retrieval system shall be connected to each employee in the confined space for emergency evacuation.
10. A self-contained breathing apparatus such as a Scott SCBA shall be available for emergency use.
11. If a non-hazardous condition cannot be maintained, all workers inside the confined space will be required to use air fed or compressed air masks in place of standard cartridge respirators.


V & O Services Inc. uses the following equipment for safety and emergency rescue. V & O Services Inc. may provide or hire a rescue service, or the host facility may provide a rescue service to be used on their site. In any case, the rescue service shall be given the opportunity to examine the entry site, practice rescue and decline as appropriate. If the Confined Space is determined by the safety officer or entry supervisor to be an IDLH (*Immediately Dangerous to Life and Health*) environment, a rescue service shall be onsite in the immediate area to assist with all equipment and any emergency situations that might arise.

Safety and Emergency Rescue Equipment

- A. Safety Equipment
 - Mechanical device for retrieval of personnel.
 - Full body harness allowing retrieval line attachment to the center of the entrant's back near the shoulders or above the head.
 - Retrieval line.
 - Tripod.
 - Portable hand lights.
 - Access ladder or other access equipment.
 - Ventilation equipment.
 - Barriers (i.e. collapsible guardrails, fences, locks, etc.).

Emergency Rescue Equipment

- B. Extra retrieval line.
 - Extra full body harness allowing retrieval line attachment to the center of the entrant's back near the shoulders or above the head.
 - Emergency medical/first aid kit.
 - If emergency team is not on site, call 911 for emergency rescue.

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OSHA REFERENCE


Confined spaces are governed by the general industry standard 29 CFR 1910.146 and ANSI/ASSE standard Z117.1-2003

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Confined Space Permit

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		Initial Issue Date	5/1/2015
LEAD		Revision Date:	3/19/2018
		Revision No.	1
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Purpose

The purpose of this procedure is to identify the controls and actions necessary to prevent adverse health effects to employees from occupational exposure to lead, and to ensure that V & O Services Inc. lead exposure management practices meet regulatory requirements.

Scope

This procedure applies to V & O Services Inc. operations where employees may be exposed to lead while working with lead containing materials during routine maintenance or emergency situations. When work is performed on a non- owned or operated site, the operator's program shall take precedence, however, this document covers V & O Services Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.


Responsibilities

Managers and Supervisors

- In coordination with the Safety Manager, develop and implement written project/task specific lead exposure management procedures prior to the start of activities to reduce exposure to or below the permissible limits.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Ensure individuals responsible for monitoring areas of exposure are properly trained.
- Ensure personnel receive documented medical surveillance.
- Ensure that all affected employees receive initial and annual lead management training.
- Inform the Safety Manager of upcoming work involving lead-containing materials, allowing the Safety Manager to provide any necessary monitoring.
- Ensure employees have the appropriate personal protective equipment (PPE) and are properly trained in its use and care, including respiratory protection, full body disposable clothing and gloves, when the Action Level is expected to be met or exceeded.
- Ensure employees comply with the lead exposure management procedure.

Safety Manager

- Coordinate air sampling and monitoring activities, ensuring monitoring equipment is in proper working order and, as necessary, modifying the lead exposure management procedures to reflect exposure monitoring data.
- Maintain the lead exposure management procedure, notifying management of any regulatory changes and ensuring compliance with federal and state requirements.
- Coordinate initial and annual refresher training activities.
- Coordinate the medical surveillance program for employees exposed to lead above the Action Level for more than 30 days per year.
- Coordinate waste management and disposal activities; ensuring waste with lead containing materials is disposed of only at an approved facility.

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Affected Employees

- Comply with the lead exposure management procedure, consulting with the supervisor or Safety Manager to ensure the proper PPE is used when required.
- Comply with the medical surveillance program.
- Attend initial and annual refresher training.
- Wear respiratory protection equipment and other specified PPE as required by the project/task specific control program.
- Maintain respiratory protection equipment in good working order, notifying the supervisor or Safety Manager of any problems prior to starting work.
- Review material safety data sheets or consult with the supervisor to identify any container with lead-containing material.
- Leave the work area to wash if skin irritation is noted or if PPE has been compromised.

Procedure

Written Compliance Program


- Each worksite shall develop and implement written project/task site specific lead exposure management procedures prior to the start of activities to reduce exposure to or below the permissible limits if exposure is possible.
- The procedure shall include engineering controls, work practices, PPE, documentation of air sampling, including the source of lead, a description of each lead related task in which lead is emitted should be outlined and all employees shall be trained prior to work beginning.
- The program shall be revised and updated at least every 6 months.

Permissible Exposure Limits

- Per OSHA regulation, employees shall not be exposed to greater than 50 micrograms per cubic meter of air (50 µg/m³), time-weighted average, during an 8-hour workday. This permissible exposure limit (PEL) includes the use of respiratory protection. If an employee is exposed more than 8 hours in any one workday, the maximum PEL (µg/m³) shall be calculated by using the following formula:
- 400/hours worked in the day
- For example: 400/12 hours = 33.33 µg/m³
- If respirators are used to supplement engineering and/or work practice controls, the respirator's protection factor may be used to determine compliance with the PEL.

Exposure (Air) Monitoring

- Exposure is defined in this section to be any employee who is not wearing a respirator to meet the Action Level and monitoring requirements in this section
- Initial air samples shall be representative of the employee's regular, daily activities.
- Initial breathing air sampling results:
 - If the initial monitoring is less than the Action Level, monitoring need not be repeated unless there has been a production, process, control, or personnel change which may result in new or additional exposure to lead

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- If the initial determination or subsequent monitoring reveals employee exposure to be at or above the Action Level but below the PEL, monitoring must be performed at least every six (6) months, with the cycle continuing until two (2) samples taken at least seven (7) days apart are below the action level
- If the initial determination exceeds the PEL, monitoring will be performed quarterly until two (2) samples taken at least seven (7) days apart are below the PEL but above the Action Level, and the monitoring frequency described above will be used
- Within 15 working days after the receipt of the results of any monitoring V & O Services Inc. shall notify all affected employees of these results either individually in writing or by posting the results in an appropriate location that is accessible to affected employees.
- Whenever the results indicate that the exposure, without regard to respirators, exceeds the permissible exposure limit, V & O Services Inc. shall include in the written notice a statement that the permissible exposure limit was exceeded and a description of the corrective action taken or to be taken to reduce exposure to or below the permissible exposure limit.

Control Measures

Engineering Controls

- If an employee is exposed to lead above the PEL for 30 or more days in a year, engineering controls, including administrative controls, will be implemented to reduce the exposure to or below the permissible exposure. If such controls are not feasible V & O Services Inc. must demonstrate and document the reasons.
- Respiratory protection will be used if engineering and administrative controls are not effective in reducing the exposure to or below the PEL
- If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed
- When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system
- Whenever possible, use a wet system to reduce airborne dust
- Whenever possible, substitute lead material with non-lead material


Administrative Controls

- Administrative controls will include job rotation schedules to reduce employee PEL exposure.
- When exposure to lead is at or above the PEL V & O Services Inc. shall provide lunch rooms, decontamination, changing, shower and hygiene facilities.
- Regulated access signs will demarcate the lead exposure regulated work areas. Signs should not be removed or defaced. The signs will read as follows:

WARNING LEAD
WORK AREA
POISON
NO SMOKING OR EATING

Personal Protective Equipment

- Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.

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- PPE will be selected on the basis of its ability to prevent absorption, inhalation and ingestion and will be provided to employees at no cost.
- PPE will reflect the needs of the employee based on work conditions, amount and duration of exposure and other known environmental factors.
- If respirators are required, they will be NIOSH certified and all employees will follow the V & O Services Inc. Respiratory Protection Program.
- An employee may choose a NIOSH certified powered, air purifying respirator (PAPR) at no extra cost to the employee. The respirator shall be used during the time period necessary to install or implement engineering or work practice controls.
- Gloves, hats, vented goggles, shoes or disposable shoe covers shall be provided at no cost. Protective clothing shall be clean and dry. Protective clothing shall be cleaned, laundered, repair and replaced as necessary and disposable clothing shall be identified and handled properly.

Medical Surveillance


- A baseline blood sample shall be obtained prior to any lead exposure.
- Employees who are or may be exposed above the Action Level for more than 30 days per year will be included in a medical surveillance program which is performed by or under the supervision of a licensed physician at no cost to the employee.
- Any employee with elevated blood levels shall be temporarily removed.
- Blood sampling and monitoring will occur at least every 6 months to each affected employee until two consecutive blood samples and analysis are acceptable.
- Employees shall be notified in writing within 5 days of blood sampling results when lead levels are not acceptable.
- Blood sampling shall occur on a monthly during a removal period of each employee removed from exposure to lead due to an elevated blood lead level.
- Whenever the results of a blood lead level test indicate that an employee's blood lead level exceeds the level for medical removal V & O Services Inc. shall provide a second (follow-up) blood sampling test within two weeks after V & O Services Inc. receives the results of the first blood sampling test.

Medical Removal

- Employees will be removed from exposure to lead when an exposure meets or exceeds the Action Level on each occasion that a periodic and follow-up blood sampling test indicates that blood lead level is at or above 60 µg/100 g of whole blood.
- An employee will be removed from exposure to lead when the average of the last three (3) blood sampling tests indicates the employee's blood level is at or above 50 µg/100 g of whole blood (the employee need not be removed if the last blood sampling test shows blood lead level to be at or below 40 µg/100 g of whole blood).
- If the employee's blood lead level does not decline adequately with 18 months of removal, the employee will be offered a medical examination to determine if the employee may be returned to his or her former job status.
- Medical Removal Protection requirements of 1910.1025(k)(2) shall be followed.

Recordkeeping

- Medical surveillance records shall be maintained for 30 years after termination of employment.
- Exposure monitoring records shall be maintained for 30 years after completion of the project.

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- Exposure and medical monitoring records shall be made available to affected employees or their representatives and to regulatory agencies upon request.

Training

Training shall be provided to employees who have the potential to exposure of lead prior to the time of initial assignment and annually thereafter. All affected employees are required to attend training programs. Training will include the following:

- Distribute a copy of the content of the lead standard and Appendices A and B of the regulation and it's readily availability for employees
- Content of any compliance plan in effect
- Access to information and training records
- Specific operations where lead exposure is or could result in being above the action level
- Engineering controls and work practices associated with the job
- Purpose, proper selection, fitting, use, and limitations of respirators
- Purpose and description of the medical surveillance program, which will include potential health effects, (including there could be adverse effects on reproductive systems) and the medical removal program
- Instructions to employees that chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician;

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

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EXCAVATION		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

The following excavation procedures apply to trenches and excavation. An excavation is any cavity or hole in the earth formed by digging or blasting. A trench is defined as any excavation deeper than 4' and deeper than it is wide but the width at the bottom is less than 15 feet.

V & O Services Inc. Corporation's policy is to permit only trained and authorized personnel to create or work in excavations. These procedures are applicable to both daily workers and those who only occasionally work with excavations.

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.

The project Superintendent or Site Safety Supervisor is the competent person in charge of these excavation procedures, with employees being trained to the level of competence for the types of excavations with which they work.

All supervisors and management employees are required to attend OSHA Excavation training prior to starting any excavation work. This training shall be renewed every (3) three years.

PROCEDURE

Before excavating:

Complete an Excavation Checklist

Contact utility companies or property owners for utility locations.

Missouri One Call at 1-800-DIG-RITE (1-800-344-7483).

Illinois, J.U.L.I.E. at 1-800-892-0123.

Any other state, contact local utility locator program or Corporate Safety Department for assistance.

Remove or adequately support objects in the excavation area that could create a hazard to employees (i.e. trees, rocks, sidewalks, adjacent structure underpinning, etc.).

Classify type of soil or rock by visual and manual test in accordance with Appendix A in Subpart P of the OSHA standard.


Prior to any excavation, the V & O Services Inc. Excavation Checklist must be completed.

Competent person chooses method for sloping, benching or protective support system, as necessary.

- Sloping & Benching
- Timber Shoring
- Aluminum Hydraulic Shoring
- Pneumatic Hydraulic Shoring
- Trench Jacks (screw Jacks)
- Trench Shields/Boxes

Excavation Requirements

The Competent Person inspects the excavation and adjacent areas on a daily basis for possible cave-in, failure of protective systems/equipment, hazardous atmospheres or other hazardous conditions.

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Inspections are required after occurrence of any natural or manmade events (such as rain or blasting) that could increase the potential for hazards.

Employees may not begin work until after Competent Person inspections are complete.

A warning system shall be used to alert operators of heavy equipment and other employees at the work site of the edge of an excavation (i.e. leading edge protection/barricades.)

Place spoils, equipment, materials, debris a minimum of 2 feet from the edge.

Provide overhead protection or the use of retaining devices that are sufficient to prevent materials or equipment from falling or rolling into the excavation.

Fall protection or prevention will be required around excavations or trenches greater than 6 feet deep.

Cranes must maintain a standoff distance from excavations and trenches; 1.5 feet for every 1 foot of depth unless engineering data is available.

Employees are not permitted under loads that are handled by lifting or digging equipment.

Employees are not allowed to work in the excavation above other employees unless the lower level employees are adequately protected.

Provide diversion ditches, dikes, or other means to prevent surface water from entering an excavation and to provide drainage to the adjacent area.

Competent Person tests atmosphere where oxygen deficiency or a hazardous atmosphere exists or could reasonably exist.

Emergency rescue equipment is readily available and attended when hazardous atmospheric conditions exist or may develop.

Sufficient means for exiting within 25 feet of lateral travel (maximum spacing 50').

Guardrails if there are walkways or bridges crossing over an excavation.

If emergency team is not on site, call 911 for emergency rescue.

Either the "Hand Dig" or the "Soft Dig" technique shall be utilized to remove material from at least the first 3 feet of the excavation where underground utilities are anticipated.

In excavations greater than 20 feet deep, protective support systems MUST be designed by a registered professional engineer.

For detailed information on the above mentioned protective systems, see appendices B, C, D & E in Subpart P of the OSHA construction standard

OSHA REFERENCE


Excavations are covered in the OSHA Construction Standard 29 CFR 1926 Subpart P.

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Excavation Checklist

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-LADDER
		Initial Issue Date	5/1/2015
LADDERS		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 30 Page 1 of 3

PURPOSE & APPLICATION

The purpose of this policy is to inform employees of any required training and safe work practices for using ladders during the course of their work.


This policy applies to step ladders, extension ladders, fixed ladders and job-built ladders. Ladder accidents usually are caused by improper selection, care or use, not by manufacturing defects. Some of the more common hazards involving ladders, such as instability, electrical shock, and falls, can be predicted and prevented. Prevention requires proper planning, correct ladder selection, good work procedures and adequate ladder maintenance.

PROCEDURE

Safe Work Practices:

GENERAL

- Whenever possible, avoid working from ladders; substitute a stable work platform or scaffold that is fully decked and with a complete guardrail system.
- All ladders will be visually inspected on a regular basis and before each use.
- Do not hand-carry tools or other loads while climbing a ladder.
- Always face the ladder. Keep belt buckle between rails to prevent overreaching when ascending or descending. Do not try reaching so far that you lose your balance; move the ladder.
- Check Duty Rating. Ladders are designed for loads, including worker, tools, clothing and materials; ladders must be rated 1A or greater. Loads for ladders shall not exceed duty rating.
- Ladder rungs must be uniformly spaced on all ladders according to OSHA standards.
- There will be only one person on a ladder at a time. Place both ladder feet on firm level surface.
- Always maintain 3 points of contact with the ladder. Three points of contact can mean two feet and one hand, or two feet and the body supported by the ladder.
- Do not try to move ladder while on it by "walking" or bouncing the ladder.
- Avoid applying excessive force while on a ladder.
- Never use a ladder as a plank, brace or support or on a scaffold.
- Check for fatigue or damage by testing to see if the ladder leans or tips over when positioned on a level surface.
- Never climb through guardrails or wire rope perimeter protection to access ladders.
- Absolutely, under no circumstances, should a defective ladder be used. Tag and remove from service immediately and report it to the proper person.
- Use the ladder only for its intended and designed purpose.
- Proper usage of ladders must be noted on all applicable PTSP.
- Double-cleated or double ladders are required when ladders are the only access/egress to a work area where 25 or more employees work or when a ladder serves simultaneous two-way traffic.
- Each contractor will be required to use their own ladders and not ladders belonging to other trades.
- No wooden or aluminum ladders may be used in proximity to overhead powerlines.
- Job-built ladders must meet or exceed manufacturer specifications of design strength criteria for vertical uprights, rungs and rung spacing.
- Ladders must be properly stored so they will not be damaged when not in use.
- Maintain a 10 feet standoff distance from overhead powerlines unless other precautions are taken. Working closer than 10 feet to power lines requires clearance from the Safety Team.

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- Never repair a manufactured ladder in the field; only qualified facilities and technicians are to make repairs to ladders.
- Always maintain clear, unobstructed access to ladders.
- Fixed ladders over 20 feet long must be equipped with additional safety devices to prevent falls, otherwise fall protection systems must be utilized while climbing.
- If a stable position cannot be maintained while working from a ladder, fall protection systems will be required. Some clients require the use of fall protection systems when working on ladders over 6 feet or they will prohibit the use of ladders for anything other than access.
- Fall protection may be required during ladder use if an employee cannot maintain a stable position. Stable position is considered to be three points of contact or two feet stable, facing the ladder with belt buckle inside the uprights and upper body in contact with the ladder.

STEP LADDERS

- Do not stand or sit on the top 2 steps of a stepladder.
- Step ladders should be securely spread open. Never use a folding step ladder in a closed position.
- Do not stand on or climb cross bracing.
- Install offset guardrails around extension or other ladders used to access landings, scaffolds or floors whenever possible to prevent falls or gaps in guardrail systems.

EXTENSION/STRAIGHT LADDERS

- Extension ladders should extend 3 feet above the access area.
- Secure the ladder from movement. If possible, secure at the top and bottom; have someone hold the ladder if necessary.
- Install offset guardrails around extension or other ladders used to access landings, scaffolds or floors whenever possible to prevent falls or gaps in guardrail systems.
- Don't stand on the top 4 rungs of a straight ladder.
- Set up straight ladders using the 4 to 1 rule. The distance from the wall to the base of the ladder should be one-fourth the distance from the base of the ladder to where it touches the wall.
- The rails of the extension ladder must be supported equally at the top.

Hazard Recognition:

Falls

Possible injury from falls as a result of ladders slipping or moving while in use.

Collapse/Failure

Failure of a ladder from overloading, defects or damage.

Electrocution/Shock


Contact with overhead power lines.

Slips, Trips and Falls

Debris, materials, extension cords, etc in path of ladder access.

Struck By

Fall equipment/material from employee working from a ladder.

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Ladders being struck by moving equipment or doors opening into them.

Training:

- General construction hazard training in OSHA 10 and 30-hour training, daily PTSP and weekly TBT topics.

Inspection:

Before each use, perform a ladder inspection. If one of the following conditions is present, the ladder must be discarded or tagged for repairs.

- Broken, missing or loose-steps, rungs or cleats.
- Cracked side rails.
- Movable parts do not operate.
- Excess play in movable parts.
- Damaged or missing safety feet.

Before using a ladder, inspect the area in which the ladder is to be used and if possible remove any tools or material that may increase the chance of injury in the event of a fall.

OSHA REFERENCE


29 CFR 1926 Subpart X Ladders

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-MOBILE
		Initial Issue Date	5/1/2015
MOBILE EQUIPMENT		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

The purpose of this policy is to inform employees of any required training and safe work practices for use of jobsite mobile equipment such as skid steers, aerial lifts, forklifts/lulls, backhoes/truckhoes and cranes.

PROCEDURE

Safe Work Practices:

- Only certified/qualified operators are authorized to operate equipment.
- Jobsite minimum PPE must be worn by all operators when off the equipment.
- Additional PPE must be worn based on the hazards of the work – respirators, hearing protection, fall protection may be required for certain operations.
- All equipment should have a daily, documented inspection.
- Seat belts should be worn at all times.
- All mobile equipment should have a working fire extinguisher on board.
- The swing radius and overhead work areas of equipment should be barricaded at all times.
- Do not approach equipment in use without operator’s knowledge; ensure operator sees you and you see him.
- Only the operator should ride the equipment unless a seat is provided for another person.
- Keys should be removed when equipment is not in use or secured so it cannot be operated by others.
- Minimum 4 inches thick oak lumber should be used to crib outriggers when wood is used for cribbing.
- Equipment must be set on firm, level ground.
- Cranes – the tires must be off the ground when a mobile crane is set to make a pick, do not leave a crane with a suspended load, standoff distance for a crane from an excavation should be 1.5 times the depth unless stipulated by a registered engineer.
- Hoisting of materials must be conducted according to safety rigging practices by a qualified rigger and within the manufacturer’s guidelines and capacity of the equipment.
- Hoisting of personnel with mobile equipment may only be performed in an engineered platform compliant with OSHA and manufacturer’s requirements.
- All equipment must have yearly documented inspection and a copy kept on board.
- Equipment should not be within 10 feet of energized power lines unless OSHA 1926.1401 guidelines are met.
- Weights of all loads should be known.
- Loads imposed on surfaces must be planned for equipment operation, weight of equipment on roadways, near excavations, soil, sidewalks, parking lots, etc.
- Loads over 75% of capacity require a critical picking permit.
- Anytime equipment is being operated in the blind, there must be someone directing the operator.
- No other employees or subcontractors are to operate mobile equipment owned by V & O Services Inc. without proper, documented authorization, hold harmless agreements and proper insurance.
- Extreme caution must be taken regarding pinch points for operation of equipment and changing of attachments. Only qualified persons shall perform attachment changes on equipment under the direction/supervision of a qualified or certified operator or Competent Person.
- When available, all mobile equipment must be equipped with overhead and rollover protection.
- Spill kits must be available onsite when any mobile equipment is being operated to remediate any fluid or fuel spillage or leaks; diapers may be required on certain equipment in certain circumstances.

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		Initial Issue Date	5/1/2015
MOBILE EQUIPMENT		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 31 Page 2 of 3

- Spotters must be used when moving, loading, unloading or transporting mobile equipment in congested areas to avoid contact with people or fixed objects.

Hazard Recognition:

Electrocution

Overhead and underground utilities must be identified in work areas prior to equipment operation and proper standoff distances maintained. Soft dig methods will be required when in proximity to known underground utilities.

Tip Over

All equipment operators must understand the stability characteristics of the equipment being operated and plan accordingly to maintain stability and protect themselves in the event of an overturn.

Caught Between

Public or employees caught between equipment and immobile structures, materials and earth banks. A minimum of 6 feet standoff distances must be maintained for all personnel (public and site personnel) around mobile equipment.

Struck By

Public or employees struck by rotating, moving, turning, swinging or pile driving equipment and immobile structures, materials and earth banks. Again, a minimum of 6 feet standoff distance must be maintained for all personnel (public and site personnel) around mobile equipment.

Training:

- All operators must be certified to operate mobile equipment.

Inspection & Maintenance:

A documented inspection must be performed at the start of each work shift and include the following:

- Operational checks – lights, brakes, steering, gauges, wipers, horn, backup alarm, windows, seat belt, heater/air conditioner, indoor window latches
- Safety devices
- Levels/Condition – fuel, engine oil, transmission fluid, hydraulic fluid, tires, handrails, catwalk, fire extinguisher
- Any deficiencies should be noted on the documented inspection form and immediately reported to the site superintendent for repair.

OSHA REFERENCE

1926.600 Subpart O, Equipment


RELATED SECTIONS

NA


APPLICABLE FORMS (APPENDIX B)

Aerial Work Platform Daily Inspection Log

Crane Operator’s Inspection Log

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		Initial Issue Date	5/1/2015
MOBILE EQUIPMENT		Revision Date:	3/19/2018
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Forklift Pre-Shift Inspection Checklist
Mobile Equipment Operator's Inspection Log
Skid Steer/Bobcat Safety Inspection Checklist

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		Initial Issue Date	5/1/2015
SCAFFOLDING		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
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PURPOSE & APPLICATION

The purpose of this policy is to inform employees of any required training and safe work practices for scaffold use.

This policy applies to all scaffolds used in work areas, to include: mobile scaffolds (Baker scaffold and others with wheels) supported (tube & frame, structural) and suspended (swing stage). It does not apply to crane and derrick manbaskets or aerial lifts.

PROCEDURE

Competent Person:

The competent person will oversee the scaffold selection, erection, use, movement, alteration, dismantling, maintenance and daily inspection. The competent person will be knowledgeable about proper selection, care and use of the fall protection equipment and shall assess hazards related to scaffold use.


Competent Person Responsibilities:

- Continued experience with specific type of scaffold (by training or professional experience).
- Continued familiarity with all applicable regulations and industrial standards.
- Recognition that a qualified engineer should design: wood pole scaffolding over 60 feet high, tube and coupler scaffolding over 125 feet high.
- Documented daily inspection of all scaffolding: assembly procedures, guardrails, toe boards, mesh screens, planking, bracing, work practices, operational controls, housekeeping, protection from overhead hazards and tagging all scaffolds.
- Scaffold tags: Red – DO NOT USE, Yellow – USE WITH CAUTION (fall protection or other noted protection required), Green - OK (no additional protection required).
- Enforcement of corporate policy and federal regulations.

Safe Work Practices:

Scaffolds

- Erection and dismantling to be performed under the supervision of a competent person.
- A full guardrail system is required on all scaffolds regardless of height. Any exception to this rule must be submitted, reviewed and approved by the V & O Services Inc. Safety Team.
- Platform must be fully decked with no more than 1 inch between boards. Scaffold boards cannot be painted. Platforms are to be a minimum of 18 inches wide.
- Position scaffolding only on ground capable of supporting the anticipated load. Scaffolds must be able to support 4 times its intended load.
- Use proper supports (steel plate, oak timbers). Do not use barrels, boxes, loose bricks or concrete blocks for supported scaffolds.
- Use well wheel or hoist when hoisting materials onto scaffolds.
- Scaffolds must not be moved unless all tools and materials are secured.
- Wheels/casters must be locked while stationary.
- Use only similar metals in assembly for tube and coupler scaffolding.
- Follow directions of competent person.
- Secure, cleat or overlap all planking by 6 inches but no more than 12 inches.
- Maintain and inspect guardrails, toe boards and mesh screens.

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- Report damaged or weakened scaffolding components to the competent person. Damaged boards or components are to be removed from use.
- A scaffold's height to base width ratio of more than 4:1 shall be restrained from tipping by guying, tying, bracing or other equivalent means. Baker Scaffolds more than 2 sections high require outriggers for stabilization.
- Use only approved access ladders.
- Controlled Access Zones are to be used below/around masonry scaffolds and overhead work areas.
- Work platforms cannot be more than 14 inches from the face of the work.
- Avoid hot work on staging suspended by rope.
- Saw horse/horse scaffolds are prohibited from use on V & O Services Inc. projects.
- No more than 2 employees at a time will be on an 8 feet span of craftworker's bracket scaffolding unless otherwise designed for that purpose.
- Employees are not permitted to ride on mobile (rolling) scaffolds unless specifically designed to do so.

Scaffold Erection

Scaffolds are to be erected and dismantled under the supervision of a competent person. Dismantling activities should be planned and performed with the same as with erection. If scaffold erection or dismantling cannot be completed by the end of the shift, the scaffold should be tagged "out of service".

Platforms

Each platform must be a minimum of 18 inches wide and fully planked or decked. Each platform plank shall be installed so that the space between adjacent units is no more than 1 inches. guardrails, mid-rails and toe boards are required on all supported, mobile and swing stage scaffolds. Cross or horizontal bracing is required at each level of supported scaffolds to keep it square or plumb. When a scaffold's height reaches 4 times its width it must be attached to the structure every 30 feet.

Scaffold Access

All metal frame scaffolds must have a mean of access/egress. This can be gained from attached or portable ladders, stairways or the adjacent structures. Ladders must extend 3 feet above the working platform and be secured. Gates, removable guardrails or safety chains must be used at the ladder landing.

Hazard Recognition:

Employees working on any type of scaffold are exposed to the following hazards-

Falls


Caused by slipping, unsafe access, improper construction and/or the lack of fall protection such as guardrails, chains or personal fall arrest systems.

Struck-By Injuries

For supported or suspended scaffolds, this can include falling tools, materials or debris.

Scaffold Collapse

Scaffold collapse can be caused by improper construction, damaged components, ground instability, overloading or improper modification.

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Training:

- All employees who work on scaffolds must receive scaffold user training by a qualified person. Employees must receive training on the particular types of scaffolds that they are to use prior to starting work. Training should focus on the identification of hazards (such as falling, dropping items, electrical hazards, over-reaching etc.), proper load ratings, proper erection, handling, use, inspection, dismantling and care of the scaffolds. Training must also include the installation of fall protection, particularly guardrails, and the proper selection, use and care of fall protection.
- Training for suspended scaffolds (aka swing stages) should include inspection, operational and emergency descent training on the exact model the employee will be using. This is normally conducted by the swing stage installer and is required for anyone who will be on the swing stage, as well as the foreman or superintendent on site. Inspection training teaches the worker how to inspect the swing stage components, lanyard, rope grab, independent vertical lifeline and an independent lifeline anchorage.
- Employees working on electric scaffolding (e.g. swing stages) must be trained in emergency procedures to include shutdown and egress.
- Scaffold training shall be documented with employee's name, signature, date of training and training materials. Retraining shall occur every three years for employees using scaffolds. An employee may be retrained sooner if he/she shows deficient understanding or skill in handling work on a scaffold.

Inspection:

Whichever type of scaffold is chosen, due diligence must be used when constructing and inspecting. Each component of the scaffold should be inspected by a Competent Person prior to erection to make sure it is not damaged or defective. The Competent Person shall inspect the scaffolding periodically throughout the shift.

Once the supported or suspended scaffold is constructed, it should be signed-off on by the Competent Person prior to any use. This is easily documented with a scaffold tag. Green tags indicate the scaffold has been inspected prior to the shift and is ready for use; Yellow tags indicate inspection prior to start of the shift and ready for use WITH fall protection; a red tag indicates the scaffold is unsafe and cannot be used for any reason.

OSHA REFERENCE


1926.450 Subpart L Scaffolds

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Suspended Scaffolding Inspection Log

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-AERIAL
		Initial Issue Date	5/1/2015
AERIAL LIFTS		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 33 Page 1 of 3

PURPOSE & APPLICATION

This policy applies to all aerial lifts, including boom lifts and scissor lifts. For suspended personnel platforms, see SCAFFOLDING. For manbaskets, see RIGGING, HOISTING & SIGNALMAN.

PROCEDURES


Competent Person:

The competent person will remain knowledgeable about aerial lift use and inspection. He/she will manage the daily activities involving aerial lift work and will perform daily, documented inspections. The competent person will ensure that:

- Basket occupants are wearing a body harness attached to the engineered tie-off point (boom lifts and where required in other lifts).
- The lift is not moved when the boom is elevated unless specifically designed to do so.
- Lift controls are operational.
- Audible and visual alarms are operational before each use.
- Lifts are equipped with motion alarms for both travel and swing.
- Manufacturer's boom and basket maximum intended loads are not exceeded.
- Outriggers are positioned on pads or solid ground when used. Brakes are set anytime outriggers are used. Wheel chocks are installed before use on an incline.

Safe Work Practices:

- Only certified operators are authorized to operate aerial lifts.
- Ensure workers who operate lifts are properly trained in the safe use of the equipment.
- The swing radius of lifts must be barricaded at all times.
- Boom lifts require 100% tie-off at all times. Scissor lifts require tie-off if foot contact with the platform cannot be maintained or if required by the manufacturer.
- Never override hydraulic, mechanical or electrical safety devices.
- Never move the equipment with workers in an elevated platform unless this is permitted by the manufacturer.
- The guardrail or gate chain must be secure at all times.
- Lift should only be operated on firm, level ground.
- A daily documented inspection must be maintained on the lift.
- Do not allow workers to position themselves between overhead hazards, such as joists and beams, and the rails of the basket. Movement of the lift could crush the worker.
- Maintain a minimum clearance of at least 10 feet away from the nearest overhead lines. Operation within 10 feet requires compliance with OSHA guidelines.
- Work areas should have a Controlled Access Zone to warn of overhead work.
- Always treat powerlines, wires and other conductors as energized, even if they are down or appear to be insulated.
- Use a body harness with a lanyard attached to the engineered tie-off point in the boom or basket to prevent the workers from being ejected or pulled from the basket.
- Set the brakes and use wheel chocks when on an incline.
- Use outriggers if provided.
- Do not exceed the load limits of the equipment. Allow for the combined weight of the worker, tools and materials.

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- Never walk under a boom to gain access to the platform.
- Do not tie the platform off to any structure for any reason.
- Stand on the platform floor. Standing or sitting on the railing is prohibited (any exception to this must be approved by the Competent Person listed on the PTSP).
- Always look in the direction the machine is moving.
- Do not rest the boom or basket on any steel structure.
- If necessary to exit the basket at elevated heights, 100% fall protection methods are required during the transfer from the basket to an approved anchorage location.
- Load capacities should never be exceeded. Material, tools and personnel should be factored into the load weight.
- Erect barricading or use a spotter on the ground when operating in high-traffic areas to keep personnel 6 feet from the lift.
- Keep hands off the external portion of the basket when raising or lowering the basket.
- A tagline must be used to raise tools/materials when the basket is in a work position.
- Secure all tools in the lift so they will not fall out.
- Lifts are not to be used as a crane.
- Remove key when not in use.
- Aerial lifts must be 12 inches or closer to a structure before exiting.

Hazard Recognition:

Tip Over

Lifts are intended to be operated/elevated only on firm, level surfaces unless equipped with outriggers that are designed for use on sloped surfaces. All lifts will tip over if elevated on a slope that exceeds the manufacturer's recommendations or if they are driven on uneven terrain, including drop-offs or holes.

Falls

A full body harness and lanyard are required for all boom lifts. Do not operate the lift until the entry is secured (chain or gate). Never sit, stand or climb on the guardrails or try to climb down from the platform. Fall protection is not required in all scissor or vertical lifts but is required if employees cannot maintain contact with the platform floor.


Collision

Collisions can happen at ground level or overhead. Be sure to always check for overhead obstructions or hazards. Limit travel speed according to condition of ground surface, congestion, slope, etc.

Electrocution

The possibility of electrocution is a serious consideration when working near overhead power lines. Clearance distances of 10 feet should be maintained to avoid the possibility of the scaffold touching the power lines or being in too close proximity where the electricity can "jump" or arc to the scaffold.

Lifts are NOT insulated and provide little or no protection from electrocution. A decal should be attached to the lift that will identify the Minimum Safe Approach Distance (MSAD) of 20 feet.

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Training:

Operators – Aerial lift operators are required to be certified

Inspection:

Anytime aerial lifts are operated, a documented, daily inspection must be completed. This form will guide the Competent Person, the crew using the aerial lift and the operator through the required components of inspection.

OSHA REFERENCE

1926.453 Subpart L Scaffolds, Aerial Lifts


RELATED SECTIONS

Scaffolding (Section 32)

Rigging, Hoisting & Signalman (Section 37)

APPLICABLE FORMS (APPENDIX B)

Aerial Work Platform Daily Inspection Log

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-FALL
		Initial Issue Date	5/1/2015
FALL PROTECTION		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 34 Page 1 of 2

PURPOSE & APPLICATION

Prior to working at any height, every effort will be made to eliminate or reduce the hazard of falling. V & O Services Inc.'s fall protection policy is designed to prevent a fall while working from any height (even as low as 1 foot) and reduce the potential fall distance. Engineering controls must be exhausted prior to the use of Personal Fall Arrest System (PFAS). V & O Services Inc.'s fall protection policy is 100% tie-off when using a PFAS; all PFAS are to be designed to limit the fall distance to less than 6 feet and prevent contact with a lower level.

This applies to all work exposure of working at heights, such as scaffolds, ladders, roof work, steel erection, aerial lifts, concrete formwork and installation of reinforcing steel.

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.*

Competent Persons Responsibilities

Only competent person shall develop site specific fall plans and assessments of work place fall hazards at any height; any work at elevation from a floor or the ground.

Selection of fall protection system in accordance with the V & O Services Inc. Fall Protection Identification Protection

Table.

Fall protection and training shall be provided to employees exposed to falls equal to or greater than 6-ft per industry requirement. V & O Services Inc. reserves the right to require training for fall protection for any height of fall. Development and coordination of prompt rescue services.

Continued familiarity with all applicable regulations and industrial standards.

Continued observational safety checks of work operations.

Correct any unsafe acts or conditions immediately.

Enforcement of corporate policy and federal regulations.

Employee responsibilities

Do not work at areas of fall exposure unless trained to use fall protection systems.

Use fall protection system provided by competent person.

If selected fall protection system exposes employee to a greater hazard the employee is to notify the Foreman and the concern is to be addressed before proceeding.

Understand and adhere to the procedures of this plan and follow instructions of the Competent Person.

Bring to management's attention any unsafe or hazardous condition or act that may cause injury to themselves or any other employees.


PROCEDURE

Fall protection development by competent person

Preplans or performs work place assessment for fall hazards.

Selects fall protection system by the following priority:

- Guardrails
- Positioning devices
- Personal fall arrest system
- Safety net system
- Warning line system
- Controlled access zones

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- Safety monitoring system
- Documents reason for using fall protection system identified.

Ensures that all personal fall arrest or protection systems meet or exceed all applicable requirements of the OSHA CFR 1926, Subpart M regulations, which state that systems are to be designed to prevent free fall more than 6' or contact with a lower level.

Periodically reassesses operations to determine need for revising fall protection plans.

Adequately responds to any concerns of fall protection on site.

Ensure proper rescue provisions if a fall does occur. Any Fall Protection Plan shall detail both on-site and outside rescue services to provide prompt rescue of any employee involved in a fall.

Participates in required incident investigations in the event of a fall (with or without injuries) or a near miss.

All supervisors and management employees are required to attend OSHA Fall Protection training prior to starting any work requiring a fall protection system. This training shall be renewed every three years.

Each employee will receive documented training in fall protection procedures and strictly adhere to them. Under no circumstances shall an employee work in areas where they might be exposed to fall hazards, do work requiring fall protection devices, or use fall protection devices until they have successfully completed an OSHA compliant fall protection training program. Training program shall include recognition of fall hazards, awareness, inspection, assembly and use of personal fall protection systems, warning systems and guardrails or barrier systems used to prevent falls. Retraining shall be required for employee if deficiencies in training or fall protection awareness are noted, if the work place changes or if the fall protection system or equipment changes making previous training obsolete.

OSHA REFERENCE


This plan is based on the OSHA CFR 1926, Subpart M, Fall Protection requirements.

RELATED SECTION

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-HOTWORK
		Initial Issue Date	5/1/2015
HOT WORK & FIRE PREVENTION		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 35 Page 1 of 3

PURPOSE & APPLICATION

The purpose of this policy is to inform employees of any required training and safe work practices for working with a heat source.

This policy applies to work such as grinding, cutting, welding or any other work that consists of using a flame or creating sparks.

PROCEDURE


Safe Work Practices:

HOT WORK

- Hot work requires a hot work permit be filled out.
- Hydrant water supply is available in general proximity of the site.
- A 10# ABC fire extinguishers will be maintained within 25 feet of the hot work.
- Proper hazard specific PPE must be worn while performing hot work in addition to the minimum required PPE. This PPE should be identified on the daily PTSP.
- Typical hot work operations will cease a minimum of **1 hour** prior to the end of each shift. A fire watch walk-through will be conducted prior to leaving the site. Note: Duration of fire watch following work operations may vary depending on Owner requirements and occupancy of building.
- Daily cleanup of dust/debris at building penetrations is required.
- Ensure adequate ventilation or air monitoring in the work area.
- Operators inspect all equipment (hoses, gauges, leads, etc) prior to each use. If any equipment is damaged or defective, equipment shall be tagged and removed from service until repaired by qualified personnel.
- Torch sets should have a back flash arrestor.
- Torch sets should only be hoisted if contained in a cart that is designed to be hoisted.
- Torch sets must be broken down and bottles capped when not in use or at the end of each shift.
- Combustibles are to be removed if within a 35 feet radius of hot work.
- If fire hazards cannot be removed from the vicinity of hot work, shields, screens and guards shall be used to protect combustible items from slag, sparks and heat.
- Avoid wearing oily, greasy or dirty gloves when performing hot work.
- Shields/Screens should be used to avoid exposure to arc flash.
- All employees engaged in or supervising hot work shall be trained in the safe use of their tools and equipment and in the identification of associated hazards of performing hot work tasks. Training shall be documented prior to the start of tasks involving hot work, cutting or welding.
- If hot work, cutting or welding cannot be done safely, it shall not be done.

FIRE PREVENTION

- There will be no unmanned open flame heaters.
- All gas cylinders will be stored and transported upright, secured and capped off. Fuel gas cylinders will be stored separately from other dissimilar gases by a distance of 20 feet or proper fire rated material.
- Flammable materials must be stored in a UL approved flammable liquids storage cabinet when not in immediate use.
- Extinguishers at fuel points and flammable storage areas must be no closer than 25 feet and no further than 75 feet from the entrance to the area.

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- Flammable liquids must be properly labeled and stored. No more than 25 gallons may be stored outside of flammable cabinets.
- All flammable liquids must be stored in UL approved safety cans.
- Fire extinguishers shall be conspicuously located.
- Inside a building, fire extinguishers shall be located at least every 3,000 sq ft.
- Minimum of one fire extinguisher located on each floor.
- Multi-story buildings shall have a fire extinguisher on every floor located near the stairway.
- Use of a fire extinguisher constitutes an incident and must be reported to the superintendent.
- All employees must know emergency procedures in the event of a fire. Extinguishers and emergency egress paths must be identified.

Hot Work Permit Procedures:

- Hot work area will be inspected and Hot Work Permits will be issued by authorized V & O Services Inc. or Owner/Client representative. Permits will only be valid for one work shift.
- Hot work will require a full-time dedicated fire watch with 10# ABC extinguisher present.
- A trained fire watch is required under the following 5 conditions:
 - i. If hot work is in a location where other than a minor fire might occur
 - ii. If combustible material is within 35 feet radius of the hot work
 - iii. If combustible materials outside 35 feet radius of hot work are easily ignited
 - iv. If walls, floor or ceiling near hot work are metal and behind and adjacent to those surfaces are combustible materials
 - v. If wall or floor openings with 35 feet radius of hot work expose combustible materials
- Dedicated fire watch must monitor area for **1 hour** after heat source is eliminated.
- Project area must be staffed with labor or management personnel for **an additional 1 hour** after hot work has stopped; must have fire extinguisher available in area.

Hazard Recognition:

Fire Hazards

Employees should be vigilant to any situation that would contradict the safe work practices listed above. This would include:


- Seeing hot work performed without an extinguisher nearby.
- Smoking near flammable storage areas.
- Oily or greasy rags near hot work.

Training:

- Employees engaged in various types of hot work, including Welders, Cutters, Hot work Supervisors, and Fire Watch Attendants, shall receive training on the P.A.S.S. method of using a fire extinguisher. Training shall be offered prior to initial assignment and renewal training offered annually.
- At each jobsite, each employee should receive a Site Specific Orientation which will inform them of fire extinguisher locations, smoking areas and the hot work permit procedures.

Inspection:

- Every fire extinguisher should be serviced at least annually and tagged and dated to document.
- All extinguishers should be inspected monthly on jobsites and the inspection documented on its tag.

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OSHA REFERENCE


29 CFR 1926 Subpart F Fire Protection and Prevention
29 CFR 1926 Subpart J Welding and Cutting

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Hot Work Permit

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-CRANE
		Initial Issue Date	5/1/2015
CRANE SAFETY		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 36 Page 1 of 4

PURPOSE & APPLICATION

This policy is applicable when V & O Services Inc. Corporation is self-performing the work or acting as the Construction Manager. When acting as a construction manager, this policy shall be distributed to the appropriate contractors for their assurance that these procedures will be followed.

In the event that V & O Services Inc. Corporation does not hold the contracts and is acting as a Program Manager, these procedures will be recommended to the client for inclusion in the various contracts.

This policy is to assure that loads are handled properly, safely and with greatest efficiency.

PROCEDURE


- Identify V & O Services Inc. Corporation or subcontractor has a qualified competent person/operator to operate the crane.
- Determine load and type of crane to be used for operation.
- Plan critical lifts: crane exceeds 75% of lifting capacity, hoisting manbaskets or personnel, hoisting of equipment onto/into an existing structure or hoisting irreplaceable items/long-lead items/items with a high-dollar value.
- All overhead lines shall be considered to be energized, unless and until the person owning the line or utility company provides V & O Services Inc. the necessary documentation indicating it has been de-energized.
- A PTSP prior to the start of the job shall be performed by a competent person to determine any jobsite hazards; some hazards include electrical or powerlines within 10 feet of the crane or inside the swing radius, weather conditions, soft soil conditions, safety related or pedestrian/vehicle related. Any hazards within the identified crane/hoisting work zone should be identified and addressed.
- Minimum clearance between overhead power lines and any part of the crane or load must not be less than 10 feet.
- Determine safe placement of crane to protect workers and general public.
- Establish that ground conditions are able to support the crane and equipment safely per manufacturer's specifications.
- Competent person determines lift requirements and fills out critical lift form as necessary.
- Competent person must direct the assembly/disassembly of crane and hoisting equipment.
- Operator / competent person inspects crane according to manufacturer's inspection list.
- Operator performs lift.

Critical Lift Procedure

- Superintendent or competent person performs Critical Lift Calculation.
- Competent person completes Critical Lift Plan/Rigging Plan.
- Originals of both documents will be forwarded to the Corporate Safety Director.
- Copies of documents will be maintained on site until all lifting operations are complete.

Authorized Operators

- Designated operators who have been certified by an approved agency (e.g. NCCCO) or union.
- Trainees who are under the direct supervision of the designated operator.
- Inspectors certified for crane inspection.
- Test and maintenance personnel when necessary.

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


* Exceptions are oilers or supervisors whose duties may require their presence.

Operator Responsibilities

- Ensure that manufacturer's instructions and prohibitions are followed to operate, assemble, disassemble and inspect cranes and rigging/hoisting equipment.
- Proper placement of crane in relationship to load handled and landing area to obtain best-rated capacity.
- Leveling crane to within one degree (1) of level and rechecking level a minimum of three (3) times during the 8 hour work shift.
- Proper placement and use of outriggers for all lifts.
- Determination of stable or unstable ground or footing. (Should additional floats, cribbing, timbers or other structural members be needed, they shall be of proper design and sufficient to uniformly distribute load.)
- Standoff distance from excavations is 1.5 feet for every 1 feet of depth unless other engineering data is provided.
- Installation and maintenance of crane swing radius protection by marking the area using barriers, railings or warning lines.
- Conduct inspections and log findings in the crane log or inspection form.
- Notify supervisor of any needed adjustments or repairs.
- Determine that all safety devices are in working order before crane operations begin.
- Do not permit trainees to make initial lifts. The operator shall perform the first lift to determine lift stability, crane function and safety, in general.
- Maintain familiarity with crane, its care, operator's manual, load charts and wind velocity limits.
- Ensure that a crane manual with applicable operating procedures is in the cab at all times.
- Ensure that a fully competent signalman is assigned to work with the crane operator if views are obstructed, site specific safety concerns require it, or if the operator believes a signalman is needed.
- Upon request, demonstrate ability to determine total load weight and its relationship to crane load charts.
- Follow proper shut-down procedures for unattended machine
- Insure security of crane and cab when shut down
- Have final responsibility and control over the crane operations. Whenever there is any doubt as to safety, the operator shall have the authority to stop and refuse to handle loads until safety has been assured.

Operator shall not:

- Engage in any practice which may divert his attention while engaged in crane operations.
- Operate his crane if physically or mentally unfit, or if taking prescription drugs which may affect judgment.
- Respond to any signal which is unclear or is given by anyone other than appointed signalman.
EXCEPTION: The Operator shall respond to "stop" signal given by anyone.
- Swing loads over personnel
- Permit side loading of booms. Lifts shall be limited to freely suspended loads. Cranes shall not be used to drag loads sideways.

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Crane Inspection

Crane inspection shall be conducted by a qualified competent person. Inspections shall occur:

- After set up and prior to initial lift.
- Before each shift.
- After any malfunction or warning device activation.
- Monthly
- Periodic / Annual Record (third party).

If, during any safety inspection, the operator or supervisor cannot produce the required crane inspection sheets, the crane shall be immediately shut down and inspected.

All inspections will be in accordance with manufacturer’s operators manual.

V & O Services Inc. Corporation will have an independent third party conduct documented annual inspections and

maintenance of all cranes. Documented monthly inspections shall be done by a qualified competent person.

Daily records pertaining to crane inspections shall be kept on site with the crane or in the V & O Services Inc. Corporation field office.

Daily records will be sent to main office on a weekly basis.

TEAM Facility will maintain all crane maintenance and inspection records.

Load Ratings

Weight of all auxiliary handling devices (hoist block, headache balls, hooks, rigging and cable) shall be considered as part of total load.

Weight of items attached to load at the site must be added to total weight.

On board computers or bills of lading will be used to determine total load weight.

Modifications or additions to the crane or hoisting equipment may not be made without written prior approval of the crane manufacturer or approval from a registered professional engineer.

Crane Set-Up


- Four basic elements to consider:
- Total imposed load.
- Supporting surface area.
- Pounds per square foot.
- Soil stability (bearing pressure determined by engineering report or local building code departments.)

To calculate the psf, divide the load by the bearing areas.

Sample:

$$\begin{array}{rcl}
\text{Crane and load} & = & 150 \text{ tons} \\
\text{Four 2' X 2' floats} & & = \underline{16 \text{ sq. ft.}} \\
\text{Therefore} & 150 \text{ T} / 16 \text{ SF} = & 9.38 \text{ tons / sq. ft.}
\end{array}$$

Note: Moving the load over the corner outrigger concentrates a greater percentage of the load on that outrigger. The load percentage on each “corner” will vary depending on the type of crane and operating radius. A good rule to follow is to assume each corner is carrying 85% of the total load. Thus,

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150 T x 0.85 = 127 T per float or 127 T / 4 sq. ft. = 31.75 T / sq ft

Cribbing Requirements:

- Strong enough to withstand weight of crane without major deflection
- Bolted or secured together to prevent slippage and collapsing
- Complete contact with soil, no voids, unsupported areas, etc.
- Large enough to accommodate total imposed load for allowable soil bearing pressure

Tower Cranes

- Competent Person will be someone with extensive training and knowledge in the use, application, installation, shoring, climbing and removal of the machine.
- A competent, registered engineer must perform design related to crane placement (base, supports, guys, climbing arrangement, floor supports, shoring, etc.).
- Competent Person must check installation against design detail for complete accuracy.
- Competent independent party must perform inspection after installation.
- Any components or structural sections designed and manufactured or altered by anyone other than the original equipment manufacturer, or his agent, must have a certificate of a qualified, Registered Engineer attesting to the structural integrity.
- An identification number should be clearly marked on all basic, removable or altered components and attachments of the machine to show they belong to the system.
- All tower cranes of every configuration must be equipped with built in limit switches which operate automatically to prevent damage to the machine should the operator make an error.
- Every brake on the crane must be fail-safe. These brakes must not release until power has been restored and when deliberately released. The application of the brake must have direct effect on the hoisting drum; no belts or chains are allowed between the brake and the drum.

OSHA REFERENCE


29 CFR 1926 Subpart N.
29 CFR 1926.550.

RELATED SECTIONS

Aerial Lifts (Section 33)

APPLICABLE FORMS (APPENDIX B)

Critical Lifting Worksheet

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PURPOSE & APPLICATION

These procedures are provided to ensure proper rigging and control of hoisted loads and to prevent unintended release of loads and will limit hazardous conditions associated with unstable loads.

This section applies to slings, picking beams and other connecting devices used in conjunction with other material handling equipment for the movement of material by hoisting. The types of slings covered are those made from alloy steel chain, wire rope, metal mesh, natural or synthetic fiber rope (conventional three-strand construction), and synthetic web (nylon, polyester, and polypropylene).

PROCESS

Safe Work Practices:

- Identify V & O Services Inc. Corporation or subcontractor Competent Person.
- Determine load and type of rigging to be used.
- Competent Person plans and inspects rigging according to manufacturer's specifications (rigging guide).
- Weights of all loads must be known by both the operator and the rigger.
- Both the signalperson and the competent rigger should be identified prior to the pick.
- Method of communication should be established and maintained.
- Competent Person approves lift or makes adjustments.
- Certified operator performs lift.
- Competent Person selects rigging materials in accordance with Tables H-1 through H-20 of the OSHA standard or according to manufacturers selection guide.
- Plan critical lifts. Critical lifts include:
 - use of more than one crane for pick
 - hoisting personnel
 - pick exceeds 75% of the crane's rated capacity
 - hoisting of equipment onto/into an existing structure
 - hoisting irreplaceable items/long-lead items or items with a high-dollar value

Critical Lift Procedure


- Both the lift plan and the rigging plan will be forwarded to the Corporate Safety Director.
- A documented pre-lift meeting will be conducted.
- Copies of all documents will be maintained on site until all lifting operations are complete and will be used as a noted reference in the daily PTSP.

Rigger Insurance

- Rigger insurance must be verified for any subcontractor involved in a critical lift of high dollar value.
- Rigger insurance must be obtained for items with value over \$250,000 and hoisted with V & O Services Inc. equipment. Contact the Safety Department regarding Rigger Insurance.

Attaching the Load

- Load shall be attached to the hook by means of slings or other approved devices.
- No open hooks shall be used for lifts higher than 2 feet.
- Hooks used for lifts in excess of 2 feet shall have operational hook safety latches to prevent slings from jumping off hook.

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- Loads shall not exceed manufacturer's rated capacity for rigging.


General Safe Rigging Practice

- All rigging equipment shall be inspected prior to and during each shift and as necessary to ensure safety.
- Damaged or defective slings shall be immediately removed from service.
- Loads may only be hoisted in approved, load-tested or certified picking boxes or pans.
- All rigging devices including slings shall have permanently affixed identification stating size, grade, rated capacity and manufacturer.
- Rigging not in use shall be removed from the immediate work area; slings shall not be left lying on the ground or otherwise exposed to dirt and the elements.
- Rigging shall be hung on a rigging frame so that bends and kinks do not set in.
- Wire rope slings shall be lubricated as necessary during use. Slings shall be lubricated no less than every 4 months when in storage.
- "Shop-made" grabs, hooks, clamps or other lifting devices shall not be used unless proof-tested to 125 percent of their rated load by an approved-testing agency. Approval devices shall have the capacity permanently affixed.
- Tag lines should be used on all loads unless use poses additional hazards.
- Sling angles should never be less than 30 degrees; preferred angle is 60 degrees.
- Wire clips or knots shall not form eyes in wire rope bridles, slings or bull wires.
- Protruding ends of strand in splices on slings or bridles shall be covered or blunted.
- All rigging equipment in use shall have a safety factor of 5.
- Slings in use shall not be shortened by knots, bolts or other makeshift devices.
- Wire rope slings shall be padded or softeners used to protect from damage due to sharp corners.
- Slings used in a basket hitch shall have the loads balanced to prevent slippage.
- Loads handled by slings shall be landed on cribbing or dunnage so slings need not be pulled from under load.
- Slings subjected to shock loading shall be immediately removed from use and destroyed.
- When U-bolt wire rope clips are used, Table H-20 of the OSHA Rigging Standard shall be used to determine number and spacing of clips.
- Operational safety latches are required on all hooks.
- Hoisting beams shall be engineered, certified and marked with load capacity.
- Only qualified riggers are authorized to be in the rigging area.
- 55 gallon drums should only be picked using a drum picker.
- Manbaskets – considered a critical pick, baskets should be inspected and certified annually, baskets should be inspected prior to each use, a test pick performed (documented inspection to be maintained on basket) and personnel should be tied-off at all times while in the basket.

Replacement Criteria

Alloy steel chains shall be removed from service when:

- Master links, coupling links or other components are cracked or deformed.
- Sling hooks have opened more than 15% of the normal throat opening or twisted more than 10 degrees off center.
- Stretch exceeds 5% of the original reach.

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- They have been exposed to temperatures in excess of 600° F or heated above 1,000° F.
- Only the manufacturer or an equivalent entity shall repair or recondition slings covered in this section and then only in accordance with ANSI G.61.1 - 1968.
- Mechanical coupling links or “cold sheets,” bolts or clevis pins shall not be used for chain repairs.

Wire rope slings shall be removed from service when:

- Two randomly distributed broken wires are in one rope lay, or five broken wires are in one strand in one rope lay.
- Wear or scraping of one-third the original diameter of outside individual wires.
- Kinking, crushing, bird caging or similar damage results.
- End attachments are cracked, deformed or worn.
- Exposure to temperature in excess of 200° F. (fiber core) or 400° F (non-fiber core).
- Corrosion of the rope or end attachment occurs.

Natural and synthetic fiber rope slings / synthetic web slings shall be removed from service when:

- Abnormal wear is observed.
- Powdered fibers are found between strands.
- Fibers are cut or broken.
- There are variations in the size or roundness of strands.
- There is discoloration or rotting.
- There is distortion of sling hardware.
- Exposed to temperatures in excess of 180° F.
- Red indicator thread is exposed.
- Subjected to acid or caustic burns.
- Melting or charring of any part of the sling surface occurs.
- Snags, punctures, tears, or cuts are observed.
- Stitches are worn or broken.
- Fittings are distorted.
- Exposed to temperatures in excess of 180° F (Synthetic web) or 200° F (polypropylene web).

The manufacturer or any equivalent entity must perform sling repairs. Once repaired, each sling will be permanently marked or tagged and a record of the repair maintained.


Hazard Recognition:

Electrocution

The possibility of electrocution is a serious consideration when working near overhead power lines. Clearance distances of 10 feet should be maintained to avoid the possibility of the crane touching the power lines or being in too close proximity where the electricity can “jump” or arc flash to the crane.

Line of Fire

With multiple moving parts, heavy equipment and just the nature of hoisting, a pick can present many line of fire hazards. Be sure to be aware of any harm that might come from flying debris,

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moving equipment, hazards presented by gravity, sudden release of tension and point-of-operation hazards.

Suspended Loads

No employees shall work or cross under suspended loads.

Training:

Signalman

Qualification is obtained through a written or oral test and a practical test, and the qualification must be documented. A signalman will be qualified in one of the following ways:

- By an employer’s qualified evaluator
- By a third party qualified

Rigger

Qualification is obtained either by possession of a recognized degree, certificate or professional standing, or who by extensive knowledge, training and experiences has successfully demonstrated the ability to solve/resolve problems relating to rigging.

Operator

Operators will be certified in one of the following ways:

- By an accredited crane operator testing organization (e.g. NCCCO)
- Through an audited employer program

Inspection:

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

- Manbasket inspection shall follow the Manbasket Testing/Inspection Log (see Appendix B)
- Severity of service conditions.
- Frequency of sling use.
- Nature of lifts being made.
- Experience gained on the service life of slings used in similar cases.
- Inspection periods shall not be less than once every 12 months.

OSHA Reference:


- Subpart CC, Std 1926.1419 Signals—general requirements
- Subpart CC, Std 1926.1428 Signal person qualifications
- Subpart H, Std 1926.251 Rigging equipment for material handling
- Subpart N, Std 1926.552 Material hoists, personnel hoists and elevators
- Subpart R, Std 1926.753 Hoisting and rigging

Related Sections:

Crane Safety (Section 36)

Applicable forms found in Appendix B:

- Critical Lifting Worksheet
- Overhead Power Line Protocol
- Critical Pick Planning Agenda

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TRAFFIC ZONES		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

The control of traffic through work areas is an essential part of highway construction and maintenance operations and may also include building construction or large equipment operations near traffic zones. Construction and maintenance areas can present unexpected or unusual situations to the motorist. Because of this, special care should be taken in applying traffic control techniques.

The primary function of traffic control procedures is to move traffic safely and expeditiously through or around work areas.

Traffic control must be a planned activity. Traffic control plans may utilize some or all of the following methods:

- Flaggers
- Hand Signaling Devices
- Barricades
- Information Signage
- Traffic Control Signals
- Lane Restrictions
- One-way traffic control
- Road Blocks
- Detours


Maintaining good public relations is necessary. The cooperation of the various news media in publicizing the existence of and reasons for work sites can be of great assistance in keeping the motoring public well informed.

Whenever practicable, the flagger should advise the motorist of the reason for the delay and the approximate period that traffic will be halted. Flaggers and operators of construction machinery or trucks should be made to understand that every reasonable effort must be made to allow the driving public the right-of-way and prevent excessive delays.

PROCEDURE

The Superintendent or Project Manager will:


1. Identify need for work zone traffic control (anytime work is in immediate proximity of traffic)
2. Survey area to consider need for:
 - a. Flagmen
 - b. Safe placement of flagmen
 - c. Barricading & location
 - d. Detour routes (drive route to determine signage location)
 - e. Signage (to include standing and mobile sign boards)
 - f. Additional lighting
 - g. Reduced speed limit zones
 - h. Law enforcement options
3. Develop traffic control plan and communicate to Project Team.
4. Contact outside resources (as needed) for:
 - a. Signage

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- b. Law enforcement
- c. Barricading
- 5. Communicate plan to all employees within the zone.
- 6. Identify specific training needs i.e. flagmen.
- 7. Conduct training.
- 8. Execute work.
- 9. Conduct daily reassessment of work zone controls.

Items to consider for selection of work zone controls:

1. Flagmen
 - a. Average intelligence.
 - b. Has completed formal flagman training
 - c. Good physical condition, including site and hearing.
 - d. Mental alertness.
 - e. Courteous but firm manner.
 - f. Neat appearance.
 - g. Sense of responsibility for safety of public and crew.
 - h. All required site PPE.
 - i. High visibility clothing (Class 1 vest at a minimum)
 - i. Class I – (217 sq in of background and 155 sq in of reflective material) for vehicular speeds < 25 mph.
 - ii. Class II – (775 sq in of background and 201 sq in of reflective material) for vehicular traffic speeds of 25-50 mph.
 - iii. Class III – Night time traffic control – any speed.
2. Flagging Stations
 - a. Predetermined escape route(s)
 - b. Minimum 50' stand off from work area
 - c. No other workers present
 - d. High visibility or lighted area
 - e. Adequately protected or completely barricaded if possible
3. Hand Signaling Devices
 - a. Red Flags (min 24" x 24")
 - b. Flashlight beacons
 - c. Reflectorized stop/slow signs (paddles)
4. Barricades
 - a. Complete prevention of entering (jersey barriers)
 - b. Reflectorized barriers / cones
 - c. Equal spacing to not allow entering zone
5. Information Signage
 - a. Sign boards
 - b. Reduced speed limits
 - c. Construction work ahead
 - d. Lane closure/restriction ahead
6. Traffic Control Signals
 - a. Temporary automated signals

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- b. May be used for intersections, one-way traffic or construction entrance
 - c. May require time delay for all red interval to allow traffic to clear
- 7. Lane Restrictions
 - a. Must include adequate taper distance for posted speed limit
 - b. Must separate vehicle traffic from opposite direction by means of barricades
 - c. Lane openings must be clearly past work zone
- 8. Road Blocks
 - a. Highly visible
 - b. Adequate signage (approximately 300 feet standoff)
- 9. Detours
 - a. Pre planned route
 - b. Proper arrow signage
 - c. Media announcements as necessary (TV, newspaper, radio)

OSHA REFERENCE


OSHA does not reference work zones directly; they are governed by Department of Transportation regulations and the Manual of Uniform Traffic Control Devices. Construction traffic control can also be mandated by the municipality of which you are working. Contact the city, county or state departments for exact construction zone requirements.

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-HEARING
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HEARING CONSERVATION PROGRAM		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

Hearing conservation / protection is an important part of the construction process and should be implemented in all cases where an 8-hour time weighted average exposure exceeds 90dB or higher ranges for shorter durations are exceeded according to Table D-2 of OSHA reference 1926.52.

This program illustrates procedures for identifying hazard areas, evaluating engineering and administrative controls and selecting required personal protection equipment (PPE) for any task producing high noise exposure.

Implementation of this hearing conservation program requires complete cooperation by the project teams and all employees. Where employee noise exposures cannot be reduced to within recommended health limits, hearing protection will be required of all employees working in the area. It shall be the responsibility of the immediate supervisor to identify these areas and to require hearing protection when necessary.

PROCEDURE

Supervisor Responsibility


- Identify areas of concern.
- Contact Corporate Safety to help determine noise levels if necessary.
- Corporate safety may conduct personnel or area sampling if no historical data exists.
 - a. Monitoring will be done as necessary.
- Select PPE (typically properly fitting plugs, ear muffs or both).
- Provide selected PPE to all employees affected by high noise exposure.
- Ensure employees are wearing PPE.

Hearing Conservation Monitoring

- Monitoring shall be conducted when information indicates that an employee's exposure may equal or exceed an 8 hour time-weighted average of 85 decibels. Monitoring will include all continuous, intermittent and impulsive sound levels from 80 to 130 decibels.
- Monitoring shall be repeated whenever a change in production, processes, or controls increase noise exposures that may expose employees to noise at or above the action level or that the attenuation of the hearing protection provided may be inadequate.
- Employees shall be notified when monitoring results indicate that they were exposed at or above the 8 hour time-weighted average of 85 decibels.
- All affected employees shall be given the opportunity to observe any monitoring conducted and the results of the monitoring.
- Hearing protection will be provided to employees who are exposed to noise at or above an 8 hour time-weighted average of 85 decibels at no cost to the employee.
- Audiometric Testing shall be implemented for those employees with exposure levels that equal or exceed an 8 hour time-weighted average of 85 decibels.

Instruction, Training and Fitting

Each employee exposed to excessive noise shall be issued hearing protection and individually instructed in the proper use and fit of these devices. Hearing protection training will be repeated annually as part of the Tool Box Talk (TBT) program or as often as deemed necessary. If work noise conditions or PPE change, employees shall be retrained in hearing conservation and PPE shall be re-evaluated. Hearing protection shall

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be evaluated for specific noise environments to ensure proper protection levels. Training shall include 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 of protection.

Personnel Sampling

1. All record sampling will be conducted by a certified industrial hygienist
2. Sampling methods will be in accordance with OSHA and NIOSH approved methods
3. Each affected employee will be notified of sampling results

Audiometric Testing

Baseline Testing: this audiogram will be conducted within 6 months of the employee's first exposure at or above the action level of 85 decibels. This will allow all subsequent audiograms a baseline with which to be compared. Baseline audiograms must be preceded by 14 hours without workplace noise. Employees will be notified prior to baseline testing to avoid high levels of noise. Hearing protection may be used to meet this requirement.

If a mobile test van is used to meet the audiometric testing requirement, the baseline audiogram shall be conducted within 12 months. If this baseline audiogram is obtained more than 6 months after the employee's first exposure at or above the action level hearing protection must be worn until the baseline audiogram is obtained.

Annual testing: this audiogram will be conducted at least annually after the baseline audiogram has been conducted. This test will allow a comparison against the baseline audiogram. If the audiogram shows that an employee has suffered a loss (standard threshold shift) a re-test may be done within 30 days and those results are considered the annual audiogram.

If a standard threshold shift has occurred, the following steps shall be taken:

- The employee shall be notified in writing within 21 days.
- Employee shall be fitted with hearing protection.
- Employee shall be trained in the use, care and cleaning of the hearing protection.
- If the employee is already utilizing hearing protection, he/she will be refitted and retrained in the use of hearing protection. The employee may be referred for audiological evaluation or an otological examination.


Recordkeeping

All audiogram test records will be kept on file for the duration of an employee's employment at V & O Services Inc..

These records will be on file at the V & O Services Inc. corporate office and are available upon request.

Records will include the following information:

- Name and job classification of employee
- Date of audiogram Examiner's name
- Date of audiometer calibration
- Employee's most recent noise exposure assessment
- Measurements of the background sound pressure levels in test rooms.

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Noise exposure measurement records must be kept on file for at least 2 years.

OSHA REFERENCE


1926 Subpart D, 1926.52 Occupational Noise Exposure

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-BLOOD
		Initial Issue Date	5/1/2015
BLOODBORNE PATHOGENS		Revision Date:	3/19/2018
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PURPOSE & APPLICATION

V & O Services Inc. Corporation does perform work that exposes employees to bloodborne pathogens. The only potential exposure to bloodborne pathogens is through first aid treatment of an injured employee. Bloodborne Pathogens training is provided to *project superintendents* and *project engineers* on an annual basis and before initial assignment. Training records shall be kept no less than 3 years. Medical records involving exposure to bloodborne pathogens shall be kept for 30 years after the termination of the exposed employee's employment with V & O Services Inc..

V & O Services Inc. Corporation's goal is to eliminate or minimize employee occupational exposure to blood or certain other body fluids by using universal precautions when treating all employees for work-related injuries or any bystanders in emergency situations. Under circumstances that prevent you from distinguishing between body fluids, employees will assume all body fluids are potentially infectious and take necessary precautions.

V & O Services Inc. Corporation's exposure determination consists of *project superintendents* and *project engineers*. These employees may incur occupational exposure to blood or other potentially infectious materials through administration of first aid. This exposure determination was made without regard to the use of PPE (i.e. employees are considered to be exposed even if they wear PPE). All first aid and associated PPE used (including gloves, bandages, foot covers and gowns) will be made available to the employee at no cost.

PROCEDURE

To prevent exposure to bloodborne pathogens employees must follow the written exposure control plan below:


1. Use universal precautions in order to prevent contact with blood or other potentially infectious materials.
2. Utilize the *Body Fluid Disposal Kit* as the engineering control to decontaminate equipment and surfaces after exposure to bodily fluids. All items exposed to body fluids, blood or infectious material will be cleaned and decontaminated.
3. Wash hands and other affected areas as soon as possible after taking off gloves/clothes that are exposed to bodily fluids.
4. Report bodily fluid exposure on Post-Exposure Evaluation Form.

At the jobsite trailer, employees will have ready access to this V & O Services Inc. Corporate Safety, Health & Environmental Manual addressing the bloodborne pathogens exposure control procedure and the emergency action plan.

Any employee exposed to another employee's blood will be given a mandatory post-exposure Hepatitis B vaccination at no cost to the employee.

Hand washing facilities are available to employees who incur exposure to blood or other potentially infectious materials. Hand washing facilities are generally located at:

Johnny on the Spot
Project Site Trailer
Hand Cleaning Towelettes
Client Facilities

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		Initial Issue Date	5/1/2015
BLOODBORNE PATHOGENS		Revision Date:	3/19/2018
		Revision No.	1
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At jobsites unequipped with hand-washing facilities, antiseptic Hand Cleaning Towelettes are made available to employees.


The Body Fluid Disposal Kit will be maintained by the TEAM facility while in storage and shall be inspected each week as part of the job safety audit program while on the project.

Superintendents and Project Engineers may have Hepatitis B vaccinations as a preventative measure. See Hepatitis Vaccination Confirmation/Declination Form.

OSHA REFERENCE
29 CFR 1910.1030

RELATED SECTIONS
NA

APPLICABLE FORMS (APPENDIX B)
Post-Exposure Evaluation
Hepatitis Vaccination Confirmation/Declination

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-EMERG
		Initial Issue Date	5/1/2015
EMERGENCY ACTION PLAN		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 41 Page 1 of 3

PURPOSE & APPLICATION

The Emergency Action Plan is in place to ensure employee safety from fire, natural disaster, national security or other types of emergencies. It provides a written document detailing the actions and procedures to be followed in case of an emergency.

At the time of an emergency, employees should know what type of evacuation is necessary and what their role is in carrying out the plan. This plan discusses procedures for V & O Services Inc. Corporation’s corporate office at 5500 West Park Avenue in St. Louis, Missouri and outlines requirements of a site specific emergency action plan.

Types of Emergencies:

- Fire
- Toxic Chemical Release
- Terrorist Event / Bomb Threat
- Natural Disaster (Severe Weather, Tornado, Earthquake, Flood)

Types of evacuations:

- Total and immediate evacuation
- Partial evacuation of nonessential employees
- Delayed evacuation of essential employees for continued work site operation.
- Local immediate evacuation (only those employees in the immediate area of a fire)

Fire, Toxic Chemical Release, Earthquake, Terrorist Event

1. Use stairwells to evacuate building in orderly fashion.
2. Pull fire alarm while exiting building.
3. Evacuate to Ahern Fire Protection parking lot as soon as possible. Except in a toxic chemical release situation, immediately outside the building.
4. If operating equipment, tools or machinery; stop machinery as soon as possible, place it in safe a location, proceed to assigned evacuation area.
5. Company executive or safety representative conducts head count of evacuees.
6. Company first aid responders provide medical assistance within their capabilities.
7. Do not reenter building unless advised by local authorities or executive of the company.
8. Professional emergency response personnel will help with and direct all rescue and medical duty assignments upon their arrival.


Tornado, Severe Weather – When tornado warning is issued and local sirens are sounded:

1. Cease work immediately.
2. Proceed to interior room away from windows if possible (bathrooms, stairwells, closets).
3. Get under desk or table or sit on floor near wall and place head between knees.

Site Specific Plans

Site specific emergency action plans will address:

- Potential types of Emergencies
- Potential types of Evacuations
- Evacuation Routes

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- Evacuation Points
- Accountability of evacuees
- Procedures for essential personnel to remain
- Rescue and Medical duties of lead individuals
- Report procedures

Project Team must:

1. Discuss procedures for reporting a fire, bomb threat, or other emergency, the location of fire exits and/or evacuation routes/points to each employee
2. Satisfy all local fire codes and regulations as specified
3. Train designated employees in the use of fire extinguishers
4. Keep key management home telephone numbers in a safe place in the project office
5. Distribute a copy of the list to key persons, to be retained in their homes, for use in communicating an emergency during non-work hours.

Critical Site Operations

Some personnel may be selected to remain behind to care for essential site operations. These personnel will remain until their evacuation becomes absolutely necessary. Their responsibilities may include:

1. Monitoring of site power and water supplies, essential services that may not be able to be shut down for every emergency alarm.
2. Processes which must be shut down in stages or steps where certain employees must be present to assure that safe shut down procedures are completed

Superintendent Responsibilities

- Immediately notify local fire/ police department and the building/site owner representative
- Decide to remain in or evacuate the project site
- Ensure all employees are notified and a head count is taken
- Check rooms and other enclosed spaces at the project site for employees who may be trapped or otherwise unable to evacuate the area. (ONLY IF SAFE TO DO SO)
- Coordinate security protection
- Meet fire department to assist them in responding to emergency

Tornado


When a tornado watch has been issued by the National Weather Service, the Superintendent or his designee will turn on the radio to monitor the National Weather Service reports or contact the corporate office.

The Superintendent will use radios or vocal commands to alert employees to tornadoes.

It is V & O Services Inc. Corporation policy to cease activity to allow employees to seek emergency warning and shelter in the event of a tornado/hurricane. At the time the tornado warning is given to employees, it is their responsibility to evacuate to a safe sheltered area.

OSHA REFERENCE

Subpart C of 29 CFR paragraph 1926.35.


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RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-RTW
		Initial Issue Date	5/1/2015
RETURN-TO-WORK PROGRAM		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 42 Page 1 of 2

PURPOSE & APPLICATION

Whenever possible, V & O Services Inc. Corporation will try to accommodate an injured/ill employee with modified duty and an early return-to-work program.

Employees are V & O Services Inc. Corporation's most important asset; the company strives to ensure the best possible safety, health and performance for every employee. The Return-to-Work program helps to enable health recovery and resumption of full capabilities by injured or ill employees whose injury or illness initially restricts their ability to perform their normal job duties.

Statistics show that early return-to-work programs help to keep morale high, speed up the recovery process, and help keep workers' compensation costs down.

PROCEDURE

Initial Return-to-Work

The Superintendent will notify the Corporate Safety Director as soon as receiving information of a work restriction due to injury or illness. The Corporate Safety Director will take the following steps:


1. Request diagnosing physician to submit exact medical restrictions on the patient.
2. Send copy of written restriction summary to insurance carrier and employee's supervisor.
3. Determine an alternate duty assignment based on the written restrictions.
4. Contact employee and inform them of the alternate duty assignment within their capability based on medical restrictions. Explain the Return-to-Work Program to the employee and how they will benefit by participating in it.
 - a. In workers' compensation cases, inform the employee they are required to return to work and begin these alternate duties. Employee to sign Light Duty Offer Letter.
 - b. In the case of personal injury or illness unrelated to work, inform the employee of their option to return and assume these alternate duties at this time. (This is not an open-ended offer. If the employee in this case refuses initially, they may not be able to return on the same conditions later because the offered duties may be assumed by someone else.)
5. If workers' compensation case employee does not return as requested, the Corporate Safety Manager will repeat contact and reiterate request.

Periodic Reassessments

1. Once employee is situated in an alternate duty assignment, the diagnosing doctor will make periodic written reassessments as to employee's restrictions, to be sent to the Corporate Safety Director. These reassessments are to be done in periods no longer than a month apart.
2. As the reassessments indicate increased health, the supervisor will be informed that the employee should assume more duties of their original job.

Return to Original Job

When written assessments indicate the employee is able to resume normal duties of original job, the Corporate Safety Director shall inform the Superintendent and return the employee back to work with no restrictions.

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OSHA REFERENCE


NA

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Light Duty Offer Letter (sample)

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		Initial Issue Date	5/1/2015
COMPANY VEHICLE & DEFENSIVE DRIVING POLICY		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 43 Page 1 of 7

PURPOSE & APPLICATION

As a driver of a company vehicle, the authorized driver has been given certain privileges. The employee assumes the duty of obeying all motor vehicle laws, maintaining the vehicle properly at all times and, otherwise, following the policies and procedures outlined in the following. All employees must sign the Driver Acknowledgement of Policies and receive a company driver orientation prior to operating a company vehicle.

Failure to comply with any part of this policy may result in disciplinary action or forfeiture of company driving privileges.

This policy outlines methods for determining driver eligibility. It also outlines driver rules, responsibilities, maintenance and inspection requirements, training requirements, accident management, reporting procedures, and emergency information.

PROCEDURE

Company Drivers will be determined by the following methods:

1. Identified by Superintendent for specific project duties – must have “Approved Driver” sticker on hard hat.
2. Identified by Executive Management for specific position or job title.
3. Identified by TEAM Facility as Teamster.


Once identified, the process is as follows:

1. Identifying authority (Superintendent, Executive, or TEAM Facility Manager) notifies Corporate Safety.
2. Corporate Safety initiates motor vehicle record check and/or background check and other administrative procedures (orientation check list, insurance request, database update, etc. as necessary.)
3. Corporate Safety coordinates with individual employee and TEAM Facility Director to set up orientation and training.
4. The Safety Department conducts orientation and training, and then forwards documentation to HR. Employee is approved for driving privileges, provided they meet all requirements for Driver Qualifications.

Company vehicles are provided to support business activities and are to be used only by qualified and authorized employees. In all cases, these vehicles are to be operated in strict compliance with motor vehicle laws of the jurisdiction in which they are driven and with the utmost regard for their care and cost-efficient use.

Driver Qualifications

- Authorized employee of company.
- At least 21 years of age.
- Minimum one-year of experience in class of vehicle operated.
- Valid driver’s license in state of residence and for proper class of vehicle.
- During the last 36 months, the driver had not:
 - Been convicted of a felony.
 - Been convicted of sale, handling or use of drugs.

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- Had automobile insurance canceled, declined or not renewed by a carrier.

Criteria for Declination, Termination, or Reassignment to a Non-Driving Position:

- One or more Type A Violations in the last 36 months
- Two or more Type B Violations in the last 36 months
- Three or more Type C Violations in the last 36 months
- One Type B Violation and two Type C Violations in the last 36 months

Categories of Motor Vehicle Violations

Type A Violation

Includes (but not limited to) DWI/DUI/OWI/OUI, Refusing Substance Test, Reckless Driving, Manslaughter, Hit & Run, eluding a Police Officer, any Felony, Drag Racing, License Suspension, and Driving with a Suspended License. Any driver with these types of violations is a major concern.

[DWI – Driving While Intoxicated, DUI- Driving While Under the Influence, OWI - Operating While Intoxicated, OUI- Operating While Under the Influence,

Type B Violation

Includes all vehicle accidents, regardless of fault. (See Accident Review in this policy regarding Preventable & Non-Preventable Classifications.)

Type C Violation

Includes all moving violations not classified as Type A or Type B. (Speeding, Improper Lane Change, Failure to Yield, running Red Lights or Stop Lights)


Type D Violation

Includes all non-moving violations (Illegal Parking, Vehicle Defects, Speeding recorded on V & O Services Inc. GPS monitoring system – 3 in a 36-month period constitutes suspension)

Driver Responsibilities

Each driver is responsible for the actual condition, care and use of the company vehicle in their possession. Therefore, the driver’s responsibilities include but are not limited to the following:

1. Operate vehicle consistent with reasonable practices that avoid abuse, theft, neglect or disrespect of the equipment.
2. Obey all traffic laws.
3. Seat belts are mandatory for driver and passengers.
4. Adhering to manufacturer’s recommendations or corporate policy regarding service, maintenance and inspection. Vehicles should not be operated with any defect that would prevent safe operation.
5. Practice safe driving techniques.
6. Restricting the use of vehicles to authorized driver only.
7. Securing the vehicle when not in use. Employees are expected to ensure “reasonable care” of company property such as computers, work papers and equipment under their control. The company will not reimburse the employee for the theft of personal property from company vehicles.

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8. Immediate reporting of all accidents, moving violations and thefts to the Corporate Safety Director and the Corporate Risk Manager/Vice President of Finance.
9. Drivers must cooperate with law enforcement agencies and company officials in matters such as accident investigations, violation of the law and violation of company policies.

Prohibited Actions


The following actions are prohibited and may result in the immediate revocation of driving privileges.

- Driving while impaired: including influenced by alcohol, illegal drugs, prescribed or over-the-counter medication, illness, fatigue or injury.
 - Any "Approved Driver" receiving a traffic violation or related offense for drug/alcohol (first offense) must participate in EAP drug/alcohol counseling.
 - Any "Approved Driver" receiving a subsequent traffic violation or related offense for drug/alcohol (second offense) will be assessed under the V & O Services Inc. Drug and Alcohol Policy as having a "Failed Test"; employee will be suspended for 30 days and eligible for re-hire pending successful completion of drug/alcohol counseling and passing a drug/alcohol screening.
 - Consistent with the V & O Services Inc. Drug and Alcohol Policy any further offenses will result in possible 1 year suspension or indefinite termination.
 - V & O Services Inc. reserves the right to terminate employment at any time for acts that do not promote a safe work environment.
 - Employee must communicate EAP compliance requirements/assessment with the Human Resources (HR) Manager. The HR Manager has the right to verify compliance with all EAP Drug/Alcohol Assessment, Counseling and Treatment requirements.
- Transporting hitchhikers and unauthorized passengers.
- Receiving payment for carrying passengers or materials.
- Radar detectors.
- Texting while driving.
- Towing: Unless authorized, drivers of company vehicles must not tow, push or pull another vehicle or trailer.
- Transporting Hazardous Materials (unless authorized.)
- Using company vehicles for business activities of other companies or personal income.
- Driving to Mexico.
- Using a radio/iPod earphones or similar device while operating a motor vehicle.
- Employees are prohibited from operating motorcycles, motor scooters or motorbikes when traveling or conducting company business.

Reporting

Accurate reporting of any of the following items must be forwarded to the Corporate Safety Director and the Corporate Risk Manager:

- Accidents: Reported immediately.
- Moving violations: Reported within three business days of conviction.
- License suspension or revocation of driving privileges: Reported the next business day and/or prior to further operation of company vehicle.
- Serious moving/other violations: Reported the next business day and/or prior to further operation of company vehicle. Serious moving violations include but are not limited to:

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- Driving while impaired/intoxicated – DUI/DWI etc.
- Reckless driving
- Leaving the scene of an accident
- Speeding that is equal to or greater than 15mph over the posted speed limit

Accident Management

IF YOU ARE INVOLVED IN AN ACCIDENT:

1. Stop at once! Check for personal injuries and send for emergency services, if needed.
2. Do not leave the scene; ask for the assistance of bystanders.
3. Protect the scene. Set emergency warning devices to prevent further injury or damage. Secure your vehicle and its contents from theft. Avoid obstructing traffic or creating other hazards.
4. Aid the injured. Check on the other party to determine if they need medical attention. As a reminder, general company policy on “offering assistance” is:
“Drivers of company vehicles must not assist disabled motorist or accident victims beyond their level of medical expertise. If the driver is unable to provide the proper medical care, they must restrict their assistance to the notification of proper authorities.”
5. Secure assistance of police whenever possible. Record names and badge numbers.
6. Make no statements.
 - Do not argue, and make no statements except to the proper authorities.
 - Sign only official police reports.
 - Do not make statements regarding the operating condition of your vehicle.
 - Do not admit fault.
 - Do not talk about what you think happened until the police or company official arrive on scene.
 - If witnesses talk to you, that is fine, do not provide your information to them about the facts of the accident.
7. Collect information. Complete Driver’s Accident Report Form at the scene as thoroughly as possible. Exchange insurance information only with other involved driver(s). Take pictures if safe to do so.
8. Report the incident. Report to your supervisor and to the Corporate Safety Director immediately after first aid has been given, authorities have been notified, and the scene has been protected.
9. If you strike an unattended vehicle and cannot locate the owner, leave a note with your name and the company’s address and phone number, get the vehicle description, VIN number and license plate number.


Important driver’s note: Please maintain an accident report form and pen/pencil in the glove compartment of your vehicle.

Accident Review

The Corporate Safety Director and the Safety Committee will review all accidents. The review will be based on the driver’s report, police reports and available witness accounts. The purpose of the review is to collect the necessary information to defend V & O Services Inc. Corporation in any litigation proceedings, to determine accident preventability and to consider improvements to avoid future such occurrences.

Accident Classifications

Non-preventable accidents:

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Accidents that occurred despite the fact that the driver exercised every reasonable precaution to avoid the incident. Examples of non-preventable accidents include, but are not limited to:

- Animal strikes.
- Struck while legally parked.
- Struck by other vehicle while stopped in traffic.

Preventable accidents:

An accident, as ruled by the Corporate Safety Director and accident review committee, where the driver failed to exercise every reasonable precaution to avoid the incident.

A preventable accident is defined as *“any accident involving a company vehicle - whether being used for company or personal use; or any vehicle while being used on company business that results in property damage and/or personal injury, in which the driver involved failed to exercise every reasonable precaution to prevent the accident.”*

Preventable accidents can include but are not limited to:

- Following too close
- Driving too fast for conditions
- Failure to observe clearances
- Failure to obey signs
- Improper turns
- Failure to observe signals from other drivers
- Failure to reduce speed
- Improper parking
- Improper passing
- Failure to yield
- Improper backing
- Failure to obey traffic signals or directions
- Exceeding the posted speed limit
- Driving While Impaired (DWI)
- Driving Under the Influence (DUI)
- Accidents involving Prohibited Actions in this policy


Discipline Policy

A driver involved in a preventable accident, moving violation or pedestrian complaint will be subject to the following:

1. Counseling by Corporate Safety Director or Company Executive.
2. Mandatory completion of National Safety Council defensive driver training course and/or other similar programs.
3. Suspension/probation or revocation of driving privileges.

Suspension/Probation (6 months) or Revocation of Company Driving Privileges:

- ◇ One Type B Violation in the last 36 months
- ◇ Two Type C Violations in the last 36 months
- ◇ One Type C Violations and two Type D Violations in the last 36 months

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- ◇ Three Type D Violations in the last 36 months

Emergencies

In case of maintenance emergency:

1. Get completely off the traveled roadway; avoid curves, hills or obstructed view.
2. Set parking brake to prevent movement.
3. Use hazard lights.
4. Set reflective triangles near vehicle at 10 feet and 100 feet to warn approaching traffic.
5. Contact TEAM Facility Director for assistance/guidance.

Maintenance and Inspection

Unless it is the functional responsibility of an employee, drivers are not expected to perform maintenance. However, it is the responsibility of drivers to become familiar with established vehicle maintenance garaging practices.

Drivers must:

- Ensure vehicle is well maintained and safe to operate.
- Be cognitively aware of the vehicle, including the condition of the upholstery, body, paint, decals, windows, overall general condition and cleanliness.
- Ensure that applicable state vehicle inspection and registration is current and valid.
- Have vehicle serviced by TEAM Facility every 3000 miles and/or when indicated.
- Conduct routine inspections of assigned vehicle

Routine inspections should include:


- Fluid levels and scheduled changes (oil level, brake fluid, transmission fluid, window washer fluid and cooling system fluid)
- Oil or grease leaks in, around or under the vehicle
- Tires (inflation and tread wear)
- Wheels, rims and fasteners
- Lights, reflectors and mirrors
- Wipers and washers, A/C, heater and defroster(s)
- Breaks (service, parking and emergency)

In the event of a defect:

1. Driver reports defect to TEAM Facility and follows further instructions.
2. TEAM Facility must authorize repairs outside the scope of routine maintenance.
3. TEAM Facility must authorize repairs at any location away from the TEAM Facility.

Garaging and storage

Employees not able to provide overnight off street parking will provide a written description of the planned parking practices to the TEAM Facility Director, who will review and authorize the proposed plan. Parking violations will be the responsibility of the authorized driver.

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Emergency Kit:

All company vehicles will be equipped with an emergency kit. The vehicle operator is responsible for all contents of the kit. The emergency kit will be inspected on an annual basis as part of the winter services. Any use of the kit must be reported to the TEAM Facility or Corporate Safety Director. The emergency kit will consist of the following:

- First Aid Kit
- Emergency Blanket (optional)
- Warning Triangles
- Fire Extinguisher
- Accident Report Form

Offering Assistance

Drivers of company vehicles must not assist disabled motorist or accident victims beyond their level of medical expertise. If a driver is unable to provide the proper medical care, they must restrict their assistance to the notification of proper authorities.

Training

V & O Services Inc. Corporation will conduct the following training for company vehicle drivers as needed:

- Driver Orientation, to include Distracted Driver Awareness.
- NSC Defensive Driver Course – as needed on individual basis.
- Winter Driving - covered annually as a Tool Box Talk (TBT).

OSHA REFERENCE

OSHA does not regulate occupational driving specifically but Subpart C of 29 CFR 1926.21(b)(2) and 1926.32(f) requires that “all employees be trained in the recognition and avoidance of unsafe conditions and...to control or eliminate any hazards or other exposure to illness or injury.”


Commercial driver requirements are specifically regulated by the Department of Transportation and can be found at <http://www.fmcsa.dot.gov/rules-regulations/rules-regulations.htm> and www.modot.org/mcs.

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

Driver Acknowledgment of Policies
Driver Accident Report

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-CELL
		Initial Issue Date	5/1/2015
CELL PHONE USE		Revision Date:	3/19/2018
		Revision No.	1
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Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 44 Page 1 of 1

PURPOSE & APPLICATION

This policy governs corporate and personal cell phone use while on the project or conducting company business.

These procedures will limit risk associated with cell phone use while performing other activities.

V & O Services Inc. Corporation understands employees do not want to miss important business calls or family emergencies. Employees must always be aware of the situation and make a calculated decision on whether it is safe to make or take a call.

PROCEDURE

Personal Phones:

- Limited to emergencies or break times only, to avoid hazards.
- Emergency call should not hinder the operation or task the employee is performing.
- Texting while driving is prohibited.

Company Phones:

- Call should not hinder or create distraction from operation or task employee is performing.
- Employees taking phone call should assess particular situation prior to answering.
- Vehicle operator (automobile or equipment) must stop operating or pull vehicle over to take phone call unless equipped with a hands free device.
- Give the receiver an opportunity to call back if hazards exist for them.
- Personal use should be on a limited basis.
- Texting while driving is prohibited.

OSHA REFERENCE


NA

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-MEDICAL
		Initial Issue Date	5/1/2015
MEDICAL SERVICES, FIRST AID & SANITATION		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 45 Page 1 of 1

PURPOSE & APPLICATION

This section illustrates guidelines for 1st Aid Kits, toilet facilities, ice, cups, water and changing areas. Good hygiene can limit the risk of all work related illnesses. This section provides best practices for hygiene.

Part of a quality safety program is ensuring good hygiene with regards to every day work activities.

PROCEDURE

1st Aid Kits

All project sites will have at least one first aid kit located in the project office. 1st Aid Kits shall be supplied with materials determined to be adequate by the Project Superintendent for the jobsite and job activities anticipated on the project.

1st Aid Kits shall be readily accessible. Employees are free to use 1st Aid over-the-counter medications at their own discretion.

At no time will a V & O Services Inc. Corporation employee physically give or hand medications to another employee.

1st Aid Kits shall be inspected prior to the job startup and weekly thereafter to ensure the availability of necessary contents.

Toilet Facilities:

Use owner furnished toilet facilities at permission of owner or;

Provide 1 portable toilet per 40 employees

Provide hand sanitizer or other means of hand washing.

Provide water and cups as necessary for employees.

All break areas must be kept clean and free of job site chemicals, dust or dirt contamination.

Do not allow changing of over clothes in eating areas.

OSHA REFERENCE


Sanitation is referenced in subpart D 29 CFR 1926.51; Medical Services and First Aid are referenced Subpart D, paragraph 1926.

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-HYGIENE
		Initial Issue Date	5/1/2015
INDUSTRIAL HYGIENE		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 46 Page 1 of 2

PURPOSE & APPLICATION

Industrial hygiene is the science of anticipating, recognizing, evaluating and controlling workplace conditions that may cause injury or illness caused by environmental health hazards.

This section will touch on environmental health hazard recognition (workplace analysis) and control methods.

PROCEDURE

Safe Work Practices:

Workplace Analysis

- Before beginning work, it should be determined if any of the job tasks or work areas may be a source of potential environmental health risks (dust, lead, asbestos, silica, noise, etc). This is decided by measuring and identifying exposures (baseline testing), tasks and risks. If any environmental health hazards are discovered, appropriate actions must be taken.

Potential Hazards


- Air Contaminants
Forms – particulate, gas, vapor
Most common – dust, fumes, mist, aerosols, fibers
- Chemical
Contact via – inhalation (breathing), absorption (skin contact), ingestion (eating/drinking)
- Biological
Forms – bacteria, viruses, fungi, living organisms
Exposure – Possible exposure when dealing with plants, animals (or their food and food processing), working in laboratories or medical settings (bodily fluids) or working with waste water.
Direct Exposure Treatment – includes Tetanus, Diphtheria & Hepatitis A vaccinations
- Physical
Forms – radiation (ionizing and non-ionizing), noise, vibration, illumination, temperature
- Ergonomic
Forms – excessive vibration and noise, eye strain, repetitive motion, heavy lifting, excessive force

Control Methods (in order of preference)

- Engineering Controls – Reduce or remove the hazard at the source or isolate the worker from the hazard.
- Work Practice Controls – Alter the way a task is performed.
- Administrative Controls – Limit workers' exposure, or duration of exposure, to the hazard.
- Personal Protective Equipment (PPE) – PPE is only to be used as a last resort. PPE is equipment used to provide worker safety where the hazard could not be engineered out or minimized. The major drawback of PPE is that it does nothing to reduce or eliminate a hazard.
- Control of Biological Hazards – shots and hygiene

General Control Methods

- Use wet methods to reduce dust production
- Local or general exhaust/ventilation at points of contaminant generation
As per CFR 1926.55, operations requiring ventilation include:
 - during gasoline, diesel or propane-fueled machine or equipment operation
 - grinding, polishing or buffing

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- spray finishing
- surface coating
- good housekeeping, waste disposal, adequate washing and eating facilities, healthy drinking water, control of insects and rodents

Hazard Recognition:

- Illness
- Skin Irritation
- Irritation of Eyes
- Irritation of Mucous Membranes
- Hearing Loss or Reduction
- Cumulative Trauma Disorder
- Acute Exposures
- Chronic Exposures

Training:

- General construction hazard training in OSHA 10 and 30-hour training, daily JSA and weekly TBT topics.

Inspection:

Workplace Analysis

- Before beginning work, it should be determined if any of the job tasks or work areas may be a source of potential environmental health hazards. This is decided by measuring and identifying exposures, tasks and risks. If any hazards are discovered, appropriate actions must be taken.

NOTE: V & O Services Inc. is not an abatement contractor. Removal of lead, asbestos and similar, hazardous materials will be subcontracted to others.

Emergency Response and Hazardous Waste Operations

- Hulcher Services 1-800-637-5471 Sauget, IL
- Veolia ES Special Services 1-800-688-4005 Sauget, IL
- REACT Environmental Eng 1-800-325-1398 St Louis, MO
- Clean Harbors 1-800-645-8265 Alton, IL

OSHA REFERENCE


OSHA Publication 3143
 1926.51 Subpart D Sanitation
 1926.55 Subpart D Gases, vapors, fumes, dusts, and mists
 ANSI/AIHA Z88 Respiratory Protection
 American Industrial Hygiene Association (AIHA)

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-AED
		Initial Issue Date	5/1/2015
AUTOMATIC EXTERNAL DEFIBRILLATOR (AED) POLICY		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 47 Page 1 of 2

PURPOSE & APPLICATION

Automated External Defibrillators (AED’s) are becoming increasingly important as a primary mean of response by certified first responders (First Aid, CPR and AED trained personnel). This policy shall be effective for using V & O Services Inc. Corporation supplied AED’s in the corporate office, TEAM Facility, and selected project sites. Owner furnished AED’s may be available and may be used by anyone trained in general AED use.

An AED is used to treat victims who experience sudden cardiac arrest. It is only to be applied to victims who are unconscious, not breathing normally and show no signs of circulation such as normal breathing, coughing or movement. The AED will analyze the heart rhythm and advise the operator if a shockable rhythm is detected. If a shockable rhythm is detected, the AED will charge to the appropriate energy level and deliver a shock

V & O Services Inc. Corporation’s goal is for every employee to be trained in First Aid, CPR and AED use. This training is available through the Corporate Safety Department and the National Safety Council.

PROCEDURE

All V & O Services Inc. Corporation AED units are registered with the City of St. Louis Fire Department, and under medical direction. The medical director is responsible for reviewing and approving the AED policy and procedure and evaluation of the AED Event Review forms and digital files downloaded from the AED unit. It is important to document the use of an AED unit and to include all patient information generated during the AED use. The AED Event Review form should be turned into the Corporate Safety Manger immediately.


It is the responsibility of the Corporate Safety Director to conduct and document a system readiness review. This review shall include the following elements:

- Training records
- AED unit operation records and maintenance
- Medical Supervision

V & O Services Inc. Corporation currently has three AED units: Unit 1 - Main office, first floor imaging room; Unit 2 - TEAM Facility next to the elevator; Unit 3 - Designated project site

In an emergency the first person on the scene is responsible for the following:

1. Access scene for safety.
2. Determine unresponsiveness.
3. Call 9-1-1 (or your specified emergency services number)
4. Open airway, check for breathing.
5. Check for signs of circulation, such as pulse, coughing or moving.
6. Page/call for a “First Responder” (A “First Responder” is any employee who is trained/certified in First Aid, CPR & AED).
7. If there is no pulse or signs of circulation call/page for an AED unit and direct the next available person to contact Emergency Medical Response Team (911).
8. Continue with CPR and use AED when ready.

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NOTE: If victim is less than eight years old or under 55lbs, remove pre-connected adult defibrillation electrodes. Connect the Infant/Child Reduced Energy Defibrillation Electrodes to the AED unit and proceed.

If NO pulse:

- Call 9-1-1 (or your specified emergency services number)
- Turn on AED and follow voice prompts, do not touch victim unless prompted to do so.
- Apply electrodes to bare chest, shave chest if needed for good contact with electrodes. If chest is dirty or wet, wipe the chest dry/clean.
- Stand clear of victim while AED unit analyses rhythm.
- If another team member is present have them record the event on the AED Event Form (located inside the AED cabinet with the AED unit).

If Shock is Advised:

- Clear area making sure no one is touching the victim.
- The AED unit will analyze and shock up to three times.
- After three shocks, AED will prompt to check for pulse and breathing. If absent, start CPR.
- The AED unit will count one minute of CPR, then prompt rescuers to stop CPR and get clear of victim so device can analyze rhythm again.
- Continue cycles of analysis, shocks and CPR until EMS arrives and disconnects the AED unit.

If No Shock Advised:

- AED will prompt to check pulse and breathing. If absent, start CPR.
- After one minute of CPR, AED will prompt rescuer to stop CPR and get clear of victim so rhythm can be analyzed.
- Continue cycles of CPR and analysis, following AED prompts until EMS arrives and relieves rescuers.

After Use:

- First Responder will complete an AED Event Review Report and forward to corporate safety department.
- AED will be downloaded by the corporate safety department within 24 hours and a copy will be sent to the medical director.
- Corporate Safety will clean, disinfect and restock the supplies in the AED unit. Supplies can be obtained from the Corporate Safety Director.
- Corporate Safety will replace Charge-Pak battery.

OSHA REFERENCE


AED requirements are not specifically referenced by OSHA. First Aid is referenced in paragraph 1926.50(c) of Subpart D of 29 CFR 1926.

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-ENVHAZ
		Initial Issue Date	5/1/2015
ENVIRONMENTAL HAZARDS / SPILL CONTROL PLAN		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 48 Page 1 of 2

PURPOSE & APPLICATION

Environmental hazards are caused by the unplanned release of chemicals or toxins into the air, soil, or waterways. Although some chemicals can have serious environmental impacts when released in large enough quantities, the most common pollutants in the construction industry are petroleum, oil and lubricants (POL's.) Asbestos and lead are covered separately in this manual.

Proper transportation, storage, and general knowledge of the chemicals you are working with are the best means for preventing environmental contamination. Maintaining good housekeeping in storage areas is critical to spill prevention and quick response in the event of a spill. This section will cover transportation and storage requirements and emergency containment or spill notification procedures. These procedures must be in place while transporting or storing more than 45 gallons of POL's.

Drivers, material handlers and others engaged in handling chemicals shall have training on proper spill prevention to include the following:


- Storage requirements
- Spill response procedures
- Spill kits and clean up materials
- Proper waste disposal
- Communication procedures in the event of a spill

Transportation/Driver Responsibilities:

- All chemicals shall have secondary containment.
- Vehicles transporting chemicals shall have either a 50 lb bag of dry sweep compound or a P.I.G. Spill Kit (45 Gal containment).
- Maintain list of chemicals and quantities in transport.
- Report vehicle accidents or spills immediately to Corporate Safety Director or an officer of the company.

Site Superintendent/Foreman Responsibilities:

- Ensure chemicals are stored properly in appropriate containers and in a safe location according to manufacturer guidelines; ensure proper containment, storage, access and material handling to minimize the risk of spills.
- Maintain list of all chemicals and SDS for each chemical on site.
- Create diagram for spill exposure:
- Illustrate where chemicals and POL's are stored, used and transferred.
- Survey drainage areas; identify routes of travel if spill occurs.
- Keep in safety file or SDS Book for immediate access when needed.
- Store containers, tanks, etc. in secondary containment.
- Use spill trays for all on-site fueling points.
- Use spill trays, buckets, etc. to collect small quantities when transferring chemicals or petroleum from one container to another.
- Immediately clean up small spills, drips, etc., including spills collected by spill trays and containers.
- Make certain containers, spill trays, transfer equipment (e.g. hoses, pumps) are compatible with the materials they contain.
- Inspect spill trays weekly for cracks, holes, leaks or over flow.

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- Have adequate equipment and materials on hand to control a spill for materials/chemicals in use.
- Keep spill control equipment/materials where chemicals or petroleum are stored and transferred for quick response.

Sample spill control equipment/materials:

- Backhoe/shovels (protective berm)
- Drip pans/spill trays
- Dry sweep / P.I.G. Spill Kit
- High absorption rags/towels
- Waterway float containment
- Safety storage cabinets (liquid storage cabinets)
- Spill pallets
- Bladder tanks
- Storm water hydrocarbon filters

PROCEDURE

Spill Control Procedure:

1. Obtain PPE as necessary (respirators, rubber gloves, rubber boots, tyvek suits, etc.).
2. Contain spill immediately if safe to do so.
3. Position containment and collection equipment at critical flow points according to drainage area survey.
4. Contact the Corporate Safety Director or Officer of the company.
5. Corporate Safety Director or superintendent will determine level of contamination.
6. Under corporate direction, contact local emergency spill response contractor or Fire Department.
7. Corporate Safety Director will contact appropriate local and federal agencies.
8. Superintendent will notify Owner.
9. Implement Crisis Communication Plan if necessary.

Spill / Hazmat Contractors:

- Hulcher Services 1-800-637-5471 Sauget, IL
- Veolia ES Special Services 1-800-688-4005 Sauget, IL
- REACT Environmental Eng 1-800-325-1398 St Louis, MO
- Clean Harbors 1-800-645-8265 Alton, IL

OSHA REFERENCE


NA

RELATED SECTIONS

Project Minimum Safety Requirements
Incident Management – Reporting / Investigations
Hazard Communication Policy (HAZCOM)
Lead / Asbestos

APPLICABLE FORMS (APPENDIX B)

Incident Investigation Report - Standard

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-UTILITY
		Initial Issue Date	5/1/2015
UTILITY LOCATE PROCEDURE		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 49 Page 1 of 1

PURPOSE & APPLICATION

Property damage, power/communication outages and injuries are caused by unforeseen utility lines either underground or hidden within a structure/concrete slab. The majority of utility lines (i.e. communication, electrical and gas lines) are documented. However, there can be serious impacts when contact is made with private or public utility lines.

Proper locating procedures and general knowledge of the utility lines are the best means for preventing injuries, property damage and communication loss. This section will cover steps and procedures for locating utilities. This process is to be used for excavations, demolitions or penetrations of concrete slabs or walls.

Superintendent/Foreman Responsibilities:

- Locate 'known' utility lines:
 1. Contact Missouri One Call, J.U.L.I.E. (in Illinois), or National One-call service (811)
 2. Reference as-builts and talk with maintenance personnel

- Locate 'unknown' utility lines:
 1. Request utility line information from property owner
 2. Reference as-builts and talk with maintenance personnel
 3. Look for suspect indicators
 - Transformers
 - Stub ups
 - Abandoned equipment pads
 - Equipment in locations not shown on drawings
 - Non-homogeneous concrete/concrete repairs
 - Lighting/switching runs
 - Electrical man-holes
 - Gas lines
 4. Contact private utility locate service or use V & O Services Inc. locate equipment
 5. Train on correct use of utility locate equipment (Amprobe 3000)
 6. Survey area with utility location equipment

PROCEDURE


1. Contact "one-call" service
2. If private property, send RFI to owner, to request utility line information.
3. If private property, contact maintenance department for utility line information.
4. Look for suspect indicators (as listed above).
5. Use private utility locate service.
6. Employ use of V & O Services Inc. equipment (as verification or extra precaution).
7. Verify all utilities are shut down (locked out/tagged out) prior to start of work.

RELATED SECTIONS

Minimum Safety Requirements
Lock Out/Tag Out Safety Procedures
Excavation Procedures

APPLICABLE FORMS (APPENDIX B)

Lock Out / Tag Out Permit

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-HOUSE
		Initial Issue Date	5/1/2015
HOUSEKEEPING & GENERAL WASTE MANAGEMENT		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
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Waste Material

Construction necessarily generates a variety of waste products that need disposal. Waste products include but are not limited to scrap wood, scrap metal, plaster, tiles, dust, trash, oil and grease, paper boxes and shipping materials, general debris and soil. Disposal and clean up procedures are part of every job and shall be taken into account during project planning and pre-task planning. Employees shall be given instructions on how to dispose of any potential wastes they are likely to encounter on the jobsite prior to beginning work. Project Managers and employees have a responsibility to maintain safe, clean and orderly jobsites in an effort to minimize tripping, combustion, exposure and environmental contamination hazards.

The elimination of combustible material is a major part of any fire prevention program. Special effort is needed on construction sites due to the large amounts of material being generated. Scrap lumber, temporary hole covers, rags used for cleaning of oil, grease, etc., are all examples of material that are easily ignited by welding sparks or other relatively small ignition sources.

Housekeeping Audits


At the discretion of the project manager, V & O Services Inc. may utilize a Housekeeping Audit form on many projects. Housekeeping program must provide for the following:

- 1) A sufficient number of containers to accommodate the amount of debris generated.
- 2) Prompt, regularly scheduled removal of debris.
- 3) Proper placement of containers. Avoid placing containers in the immediate proximity of materials and equipment, especially those susceptible to fires. Careful evaluation of the placement of the containers must also be given in order to provide adequate service and removal of the container.
- 4) Identification of containers. Containers shall be properly identified for trash, hazardous material disposal and/or recyclable materials. When possible items such as scrap metal or paper, shall be segregated out and recycled.
- 5) Debris piles shall be kept neat and orderly out of walkways. Debris piles should be barricaded and stored away from work areas when possible as to avoid tripping and exposure hazards.
- 6) Proper storage and regular pick up and disposal will occur to reduce the possibility of environmental contamination.
- 7) All loose debris shall be picked up immediately to avoid tripping hazards and damaging equipment.
- 8) Prior to the beginning of work, schedules for pickup and directions for disposal of various types of debris or material shall be communicated to employees by posting, labeling containers and pre-task planning.
- 9) The amount of waste and debris that will be generated by the work being done by V & O Services Inc. is estimated prior to the beginning of the project and steps taken to provide the appropriate number and type of disposal containers to accommodate the amount of waste/debris expected.

General Guidelines for Hazardous Waste

The generation of hazardous wastes or the exposure of V & O Services Inc. employees to hazardous wastes during

V & O Services Inc. projects **is not anticipated.**

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Any hazardous wastes or debris shall be abated or removed by the owner/client prior to the beginning of work; certificates of abatement and/or the necessary required permits for the presence of hazardous wastes on owner/client jobsites shall be provided to V & O Services Inc. by the owner/client.

In the event that a V & O Services Inc. employee should encounter hazardous wastes or materials in the course of their work, employees are instructed to avoid those materials and immediately contact the V & O Services Inc. Site Supervisor. If hazardous wastes or materials are identified, the Site Supervisor will get instructions from the Safety Officer for management and disposal procedures prior to commencing work.

OSHA REFERENCE


NA

RELATED SECTIONS

NA

APPLICABLE FORMS (APPENDIX B)

NA

	V & O SERVICES INC. CORPORATION Safety Management System	Doc No:	TC-RESPIRATORY
		Initial Issue Date	5/1/2015
RESPIRATORY PROTECTION PROGRAM		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 51 Page 1 of 6

PURPOSE & APPLICATION

V & O Services Inc.'s Respiratory Protection Program is committed to the protection of employees from hazardous atmospheres. Respiratory protection shall be provided to V & O Services Inc. employees exposed to hazardous or harmful dusts, vapor, gases, mists or oxygen deficient atmospheres.

V & O Services Inc.'s Safety Officer shall be fully trained in using respirators and effectively managing the Respiratory


Protection Program including, but not limited to, the following:

- Determining the appropriate equipment to be used in a given situation
- Identification of hazardous atmospheres
- Medical evaluations for fit testing
- Fit testing
- Proper cleaning, sanitation, maintenance and storage requirements for respiratory equipment
- Records and documentation of training
- Storage and maintenance of Respiratory Program related medical records
- Proper inspection methods

Training

Documented training shall be provided to employees required to wear respiratory protection. Training shall be required prior to the start of the job and shall include the inspection, maintenance, fit and use of respiratory equipment. Retraining will be done annually. Medical evaluations and fit tests will be given to assure each employee is properly protected using the respirator. Required respiratory protection, training and medical evaluations shall be provided at no cost to the employee. Training shall cover the following:

- The nature, extent and effect of respiratory hazards to which the employee may be exposed.
- Identification of the chemicals involved, what exposure levels would be if no respiratory protection were being used and the potential health effects of exposure if the respirator is not worn properly.
- An explanation of the operation, limitations and capabilities of the respirators selected for the employees to wear.
- An explanation of how the respirator provides protection by either filtering the air, absorbing the vapor, or providing breathing air from an uncontaminated source.
- Specific instructions regarding the type and frequency of respirator inspections so that the employee is capable of recognizing any problems that may threaten the continued protective capabilities of the respirator. The training will include the steps the employee is to follow if any problems are discovered during inspection, such as to whom they should report and where replacement equipment can be obtained if necessary.
- Procedures for donning and removing the respirator, checking the fit and seals and actually wearing the respirator.
- Employees must be clean-shaven to effectively wear a respirator and ensure a protective seal.
- An explanation of the procedure for maintenance including cleaning, disinfecting, and storage of respirators. Respirators shall be sanitized stored in a clean, dry area; inspections

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shall be done before use and during cleaning to ensure respirators are neither contaminated nor damaged.

- A discussion of the possibility of respirator malfunction or a change in situation which may require the use of a different respirator for the exposure levels involved and the procedure for dealing with these situations.
- Employees will be instructed to leave the area to wash, change cartridges or if they detect break-through or resistance when using respirators.
- In addition to training prior to work assignments in Respiratory Areas, employees required to work in these areas shall receive *annual refresher training* which includes the above-listed topics. An employee will also be retrained if the employee's use of the respirator indicates the employee's knowledge is inadequate.

Employees shall be required to demonstrate understanding of the training provided by means of a written test or oral test and/ or observation by the trainer. The trainer may be an employee or owner of V & O Services Inc. or may be a consulting firm. All trainers must have extensive knowledge of this policy and of respiratory equipment.

Respiratory Hazard Areas


A Respiratory Hazard area is an area or job assignment where the atmosphere may expose employees to the risk of injury or illness from one or more of the following causes and as further defined in the OSHA standards:

- **Confined Space:** A confined space may have flammable gas, vapors or mist. *If the atmosphere exceeds 10 percent of its lower explosive limit (LEL), the employee must stop work and exit the area until the LEL is reduced.* There is no personal protective equipment available that will protect the employee from this potential fire/explosion hazard.
- **Oxygen levels:** Atmospheric oxygen concentration below 19.5 percent (Oxygen Deficient) or above 23.5 percent (Oxygen Enriched). If either condition is found, the employee is to stop work and leave the area immediately.
- **Airborne hazards:** Concentrations of any airborne substance at such levels which could result in employee exposure in excess of the permissible exposure limit (PEL) published in 29 CFR 1910.Subpart G, Occupational Health and Environment Control, or in Subpart Z, Toxic and Hazardous Substances. *In the absence of a PEL for a particular substance, the National Institute for Occupational Safety and Health (NIOSH) or the American Conference of Governmental Industrial Hygienists (ACGIH) may have published a Recommended Exposure Limit (REL) or a Threshold Limit Value (TLV), respectively. These limits are based on a time-weighted average over a work day.*

V & O Services Inc. will conduct atmospheric testing prior to any entry into a confined space for Oxygen Levels, LEL and Toxic Vapors. The Client will identify the potential contaminants prior to the start of work. The Client will supply V & O Services Inc. Safety Department with a MSDS for all contaminants that are potentially in the work area with which employees may come into contact.

Procedures for Medical Evaluations and Fit Tests

Respiratory hazards require the wearing of respirators. Respiratory equipment will be provided in areas deemed respiratory hazard areas. However, due to the potential physiological stress (demand) on an

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employee's breathing, a medical evaluation is required to determine if the employee is capable of wearing respiratory protection.

- All employees, prior to wearing respiratory equipment, must be examined by a professional licensed health care provider, at no cost to the employee, to determine pulmonary function and be examined for other conditions that may be provided by the employee through the medical questionnaire.
- After successfully completing the medical evaluation (copies of the medical findings are retained by the Safety Department), the employee is then given a qualitative fit test for the respirator he will be assigned.
- Medical evaluations for the respiratory program will be kept by the Safety Department as confidential.
- Employees shall be given the option of discussing the results with the physician or licensed health care professional doing the evaluation.
- Evaluations shall be done during normal working hours.
- Forms for assessment shall be available for convenient processing. Should the employee require assistance with filling out these forms, the safety officer in charge of the Respiratory Program shall be able to provide direction and/or clarification.


RESPIRATORS

The choices of respiratory protection are based on the level or concentration of airborne substances and the level of Oxygen in the atmosphere. There are basically two types of respirators: Air-Purifying and Air-Supplying Respirators.

Air Purifying Respirators (APR)

Air Purifying Respirators (APR) are used to remove (purify) Particulates, Vapors and Gases. Employees are required to wear a particulate respirator to reduce lead, heavy metals, cadmium, asbestos fibers, dust, fumes, mists and NORM.

- **Particulates** are finely divided airborne materials; e.g. Dusts, Mists, Fumes and Fibers.
- **Dusts** can be from various mechanical disturbances of soil and other materials; they vary from nuisance to extremely harmful; e.g. Lead and NORM and enter the blood stream through inhalation.
- **Mists** are typically generated when liquids are atomized by spraying and they too vary from harmless to extremely harmful; e.g. paints and attach themselves to the cilia in the bronchial area of the lungs or the alveoli inside the lungs.
- **Fumes** are the by-product of melting metal (welding) or grinding. The welding fume may contain harmful levels of metals or chemicals from the flux or shielding gases and enter the blood stream through inhalation. Some of these chemicals are now presumed to cause chronic diseases such as Parkinson's.
- **Fibers** are generated through the mechanical reduction of certain materials in manufacturing and abatement. These are cotton and fiberglass in manufacturing and asbestos when disturbed by the process of removal in abatement projects.

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- **Vapors** are released from liquids at varying temperatures based on their vapor pressure. These are further defined as Organic Vapor and all have exposure limits that should not be exceeded. The over exposure can cause a very broad list of acute and chronic illnesses.
- **Gases** also are released from liquids. The gases of concern in this regulation are generated or released from corrosive liquids; some under pressure to remain liquid. These are called Acid Gases and all have exposure limits that if exceeded cause extremely harmful acute effects.

NOTE: AIR PURIFYING RESPIRATOR


1) An employee is instructed that all particulate APR's are to be replaced if breathing becomes difficult. The particulate APR is only an air filter and therefore, if working properly, will become clogged or plugged; similar to the air cleaner in their vehicle.

2) All employees are instructed to replace the APR Organic Vapor Chemical or Acid Gas Cartridges if they detect the odor or taste of the contaminant. These Chemical Cartridges should be replaced on a daily basis, if used for 8-hours or more.

Air-Supplying Respirators (ASR or SAR)

Air-Supplying Respirators (ASR or SAR) are used to provide breathing air to the employee. Because ASR's supply breathing air, the use of purifying cartridge type respirators to control contaminants is unnecessary.

- Atmospheres that contain particulates, vapors and gases above the PEL/REL/TLV are sometimes significantly above these limits, and the employee cannot be protected by just filtering. The use of ASR's then becomes mandatory for these inhalation hazards.
- Atmospheres that, by monitoring, are oxygen deficient, >19.5%, requires the mandatory use of ASR's to supply the necessary level of oxygen to the employee. The use of ASR's is also mandatory in Immediately Dangerous to Life and Health (IDLH) atmospheres.
- All IDLH entries require full body harness, retrieval system and a qualified attendant. The attendant shall have constant visual contact and communication with the qualified entrant.
- Some activities are short-term and/or may require the employee some mobility. In these instances the use of Self-Contained ASR (SCBA) is preferred. This is usually a 30 minute air supply inside a bottle and worn on the back of the employee.
- Some activities are of longer duration and the use of SCBA would require the employee to continually leave the area of work to have this bottle replaced. Other times, the wearing of the SCBA is prohibited due the configuration or limitations of the area in which the employee is working. In these instances, the other ASR is supplied by an air-line (ALR or SAL) from a source outside of the contaminated area. This source may be from one or several large bottles or it could be from a "breathing air" compressor certified for use with proper and current breathing air filters and a 10 PPM Carbon Monoxide (CO) alarm. The breathing air fittings must be incompatible with all other gases.
- When using an air line respirator system, the employee activities may require a separate and portable backup supply of breathing air. This is true in confined spaces and/or if there is a possibility for exposure from process piping that was not completely depressurized or has the potential to contain an IDLH atmosphere. This backup supply is known as a 5-

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minute egress (escape) bottle. If the ALR fails or the employee requires immediate removal, then the 5-min egress bottle shall be turned on, and the employee immediately leaves the area. This bottle is only to be used for escape.

Qualified Equipment

Respiratory equipment used by V & O Services Inc. is NIOSH and MSHA approved.

- Scott, North, 3M and MSA are the approved APR and ASR used at V & O Services Inc.. If any new equipment is added, this procedure will be revised.
- All breathing air equipment supplies Class D Breathing Air to the employee, whether or not it is from bottles supplied by a vendor or a certified Breathing Air Compressor.

Fit Testing


- All employees who are assigned respiratory equipment shall receive qualitative respirator fit testing prior to first wearing any respirator with a negative or positive pressure tight-fitting face piece.
- In addition to fit testing prior to initial use of the respirator, fit testing will also be performed whenever a different respirator face piece (size, style, model or make) is used, or if the following conditions change that may affect respirator fits.
 - Weight gain or loss of 10 or more pounds.
 - Oral surgery or the removal of 3 or more teeth.
 - Facial surgery.
- All employees will be fit tested using the same make, model, style and size of respirator that they will be using.
- Qualitative fit testing shall be performed by qualified personnel in accordance with OSHA Standard 29 CFR 1910.134.

No employee will be allowed to wear a tight fitting respirator, APR or ASR if any facial hair interferes with the sealing area. Employees who wear corrective eye wear shall not be allowed to wear full-face APR or ASR unless they can see adequately (medical evaluation) without the corrective eyewear or supplement the eyewear with “hard” contact lenses.

Maintenance and Custody of Respirator

All respirators shall be cleaned and disinfected outside the affected area at the following points in time:

- Respirators issued for the exclusive use of an employee shall be cleaned and disinfected as often as necessary to be maintained in a sanitary condition; at a minimum, prior to wearing and at end of each worked shift.
- Respirators issued to more than one (1) employee shall be cleaned and disinfected after each usage by the employee provided with the respiratory equipment.
- Respirators used in fit test testing and training shall be cleaned and disinfected after each use by the employee to assure proficiency.
- All respirators shall be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture and damaging chemicals.

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- All respirators shall be packed or stored to prevent damage to the face piece and exhalation valve.
- All respirators shall be inspected before each use and during cleaning. The applicable items to be inspected include:
- Check of respirator function; tightness of connections and of the various parts including, but not limited to, the face piece; head straps; valves; connecting tube; cartridges; canisters; or filters.
- Check of elastomeric parts for pliability and signs of deterioration.
- Respirators that fail an inspection or are otherwise found to be defective shall be removed from service, rendered unusable and discarded.
- Disposable respirators (dust masks) are to be worn by one person only and for one (1) shift only.

OSHA REFERENCE


CFR 1910.134, Respiratory Protection

RELATED SECTIONS

PPE

APPLICABLE FORMS (APPENDIX B)

Respirator Medical Evaluation (Fit Test) Form Q

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Purpose

The purpose of this procedure is to insure right of access to relevant exposure and medical records to employees and/or their designated representatives.

Key Responsibilities

V & O Services Inc. Safety Manager

- Develops local medical records practices for all worksites in accordance with this procedure and ensures employees are aware of the requirements of this procedure.
- Responsible for the review, implementation and maintenance of the local worksite medical records procedure.

Project Manager

- Responsible for the implementation and maintenance of the medical records procedure for their facility and ensuring all assets are made available for compliance with the procedure.

Employees

- All shall be familiar with this procedure and have access to their records.

Overview

This section applies to all employee exposure and medical record, and analysis thereof, made or maintained in any manner, including on an in-house or contractual (e.g., fee-for-service) basis.


- Trade secret information disclosure must follow requirements as stated in 29 CFR 1910.1020 (f) (8).
- Recognized collective bargaining agents who have statutory authority to represent the interests of the employees within the bargaining unit are automatically considered designated representatives. While these representatives do not have the right to secure individual medical records without written consent of the employee, they have the right of access to employee exposure records and analysis without employee consent.

Definitions

Access means the right and opportunity to examine and copy.

Analysis of exposure or medical records means any compilation of data, and research, or other studies based, at least in part, on information collected from individual employee exposure or medical records or other sources including information from health insurance claim forms provided that either the analysis must have been reported to the employer or no further work is being done by the person responsible for preparing the analysis.

Designated representative will mean any individual or organization to which an employee gives written authorization to exercise a right of access. For the purposes of access to employee exposure records and analyses using exposure or medical records, a recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

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Employee exposure records could include any of the types of information listed below:

- Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained;
- Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs;
- Material safety data sheets indicating that the material may pose a hazard to human health; or In the absence of the above, a chemical inventory or any other record which reveals where and when used and the identity (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.

Employee medical records are records that concern the health status of an employee and are made or maintained by a physician, nurse, or other health care personnel or technician. "Employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse or other health care personnel, or technician.

NOTE: The following will not be considered a medical record:


- Physical specimens, such as blood or urine samples, which are routinely discarded.
- Health insurance claims, accident investigation reports and other non-medical correspondence if maintained separately from the medical file.
- The record of any voluntary employee assistance program (alcohol, drug, etc.) if maintained separately.
- Records created solely in preparation for litigation which are privileged from discovery under applicable rules of procedure or evidence.

Specific Written Consent means a written authorization containing the following:

- The name and signature of the employee authorizing the release of medical information.
- The date of the written authorization.
- The name of the individual or organization that is authorized to release the medical information.
- The name of the designated representative (individual or organization) that is authorized to receive the released information.
- A general description of the medical information that is authorized to be released.
- A general description of the purpose for release of the medical information.
- A date or condition upon which the written authorization will expire (if less than one year).

A toxic substance or harmful physical agent is defined as any chemical substance, biological agent (bacteria, fungus, virus, etc.) or physical stress (noise, heat, cold, ionizing radiation or non-ionizing radiation, hypo or hyperbaric pressure, etc.) which:

- Is regulated under federal law or rule due to a hazard to health.
- Is listed in the National Institute of Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS).

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- Shows positive evidence of acute or chronic health hazard in human, animal or other biological test by or known to the employer.
- Has a Material Safety Data Sheet indicating that the substance may pose hazard to human health.

Procedure

The Safety Manager will maintain applicable medical and exposure records for all employees. All requests to access medical and exposure records and analysis based on those records must be submitted to using the forms provided for that purpose.

Access to records is provided in a reasonable time, place and manner. Access to records must be provided in a reasonable time, place and manner. If access to records cannot reasonably be provided within fifteen (15) working days, V & O Services Inc. shall within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available.

Personal identifiers (name, address, social security number, payroll number, etc.) are removed from records before access is granted. Whenever access is requested to an analysis which reports the contents of employee medical records by either direct identifier (name, address, social security number, payroll number, etc.) or by information which could reasonably be used under the circumstances indirectly to identify specific employees (exact age, height, weight, race, sex, date of initial employment, job title, etc.), personal identifiers must be removed before access is provided.

V & O Services Inc., upon request, will assure the prompt access of representatives of the Assistant Secretary of Labor for Occupational Safety and Health to employee exposure and medical records and to analyses using exposure or medical records.


Except for a recognized collective bargaining agent, any designated representative must have the employee's written permission for access to exposure records and analyses. It is necessary however, for the union representative to specify the occupational need for access to records absent the employees consent. Union representatives must have the employee's written permission to access medical records.

Copies of medical records are provided at no cost to employees. Whenever an employee or designated representative requests a copy of a record, that record must be provided at no cost.

Any review of medical or exposure records by an employee or union representative shall be done on his or her own time, outside of normal working hours, at a time mutually agreeable to the parties. The review will be conducted in person with the individual requesting access to the records.

The employee is entitled access to his or her medical records except when a physician determines that this knowledge would be detrimental to the employee's health as in such cases of terminal illness or psychological conditions. However, if the employee provides a designated representative with specific written consent, access to medical records must be provided even if the physician has denied the employee access to the records.

The authorized physician, nurse or other responsible health care personnel maintaining employee's medical records may delete the identity of anyone who has provided confidential information concerning the employee's health status but cannot withhold the information itself.

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When an analysis of medical records identifies the employee, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

Copies of exposure records of other employees with past or present job duties or working conditions like or similar to those of the employee will also be provided upon request.

Any employee or designated representative is also permitted access to any record of exposure information which pertains to a new workplace or condition(s) to which the employee is being assigned or transferred.

Records Retention

- Medical records must be preserved and retained for the duration of employment plus 30 years.
- Employee exposure records must be retained for 30 years.

Transfer of Records Should V & O Services Inc. Cease to Do Business

Whenever V & O Services Inc. ceases to do business it shall transfer all records subject to this section to the successor employer. Whenever V & O Services Inc. either is ceasing to do business and there is no successor employer to receive and maintain the records, or intends to dispose of any records required to be preserved for at least thirty (30) years, V & O Services Inc. shall transfer the records to the Director of the National Institute for Occupational Safety and Health (NIOSH) if so required by a specific occupational safety and health standard.

Employee Information

Employees are informed of the provision of recordkeeping upon initial assignment and annually thereafter. Upon an employee's first entering into employment, and at least annually thereafter, information must be given to current employees of the existence, location, availability and the person responsible for maintaining and providing access to records and each employee's rights of access to these records.

The Access to Employee Exposure and Medical Records Standard (29 CFR 1910.1020) will be readily available for review by employees upon request.

A copy of the employee notice that will be used to comply with the employee information requirements is included with policy. This notice will be posted on those bulletin boards where other notices normally appear.



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AUTHORIZATION LETTER FOR THE RELEASE OF EMPLOYEE MEDICAL RECORDS

I, _____ hereby authorize the _____
(Full name of employee) (Name of Organization)

to release to V & O Services Inc. the following medical record(s):

_____ Give specific description of the information to be released)

I give my permission for the medical information to be used for the following purpose(s):

_____ I do not give permission for any other use or reason.


_____ I understand that this authorization expires twelve (12) months from today's date unless I specify a particular date less than twelve months which is _____

Signature of employee or
his/her legal representative

Date of Signature

Reviewed on: _____ with: _____
(Date) (Signature of Organization's Representative)

Copies given: Yes _____ No _____

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ACCESS TO MEDICAL/EXPOSURE RECORDS NOTICE

Federal Regulation 29 CFR 1910.1020 requires us to inform you that V & O SERVICES INC. CORP does keep records designated as Employee Exposure and Employee Medical Records.

The above regulation gives you the right to review those records with certain exceptions.


The records are maintained in the Safety Department and the Safety Manager is responsible for the records.

A copy of CFR 1910.1020 is available for viewing upon request to the Safety Manager.

Signature

Date

Note: This notice must be posted annually

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Purpose:

The purpose of this program is to prevent injury from failing or failure of compressed gas cylinders and to establish requirements for handling, lifting and storing compressed gas cylinders safely.

Scope

This program covers all employees and contractors who handle, transport and/or use compressed gas cylinders.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper handling, storage and use requirements for compressed gas cylinders.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.

Employees

- Shall follow all requirements regarding the safe handling, storage and use of compressed gas cylinders.

Procedure

General

Cylinders shall not be accepted, stored or used if evidence of denting, bulging, pitting, cuts, neck or valve damage is observed. If damage is observed:

- The cylinder must be taken out of service.
- The cylinder's owner shall be notified to remove the cylinder from the premises.
- If owned, the cylinder shall be de-pressured and inspected as required by this program.

Cylinder Identification

Gas identification shall be stenciled or stamped on the cylinder or a label used. No compressed gas cylinder shall be accepted for use that does not legibly identify its content by name.


Handling

Valve caps must be secured onto each cylinder before moving or storage.

Secure the cylinder in a blanket when being lifted by mechanical means. Slings, ropes or electromagnets are prohibited to be used for lifting compressed gas cylinders.

The preferred means to move compressed gas cylinders is with a cart, carrier or with a helper.

Compressed gas cylinders must not be allowed to strike each other.

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When a cylinder cap cannot be removed by hand the cylinder shall be tagged "Do Not Use" and returned to the designated storage area for return to vendor.

Storing

All cylinders must be secured upright in a safe, dry, well-ventilated area that limits corrosion and deterioration.

- Cylinders must be secured by means that will prevent the cylinder from falling.
- When securing the cylinder, the restraints shall not be attached to electrical conduit or process piping.

Empty and non-empty cylinders shall be stored separately. All stored cylinders shall be capped.

Oxygen cylinders must be stored a minimum of 20 feet from combustible gas cylinders or areas where there may be open flame or arcing. Cylinders may also be stored where the oxygen is separated from combustible gas cylinders by a 5 foot or higher wall with a fire resistance rating of 30 minutes.

Storage areas for full and empty cylinders must be designated and labeled. Cylinders should be stored in definitely assigned places away from elevators, stairs or gangways.

Use

Cylinders must be equipped with the correct regulators. Regulators and cylinder valves should be inspected for grease, oil, dirt and solvents. Only tools provided by the supplier should be used to open and close cylinder valves.

Never force or modify connections.

Only regulators and gauges shall be used within their designated ratings.

The use of a pressure-reducing regulator is required at the cylinder, unless the total system is designed for the maximum cylinder pressure.

Valves must be closed when cylinders are not in use.

Cylinders shall not be used as rollers or supports.


Cylinders shall not be placed where they can come in contact with electrical circuits.

Cylinders must be protected from sparks, slag or flame from welding, burning or cutting operations.

Empty cylinders must be returned to designated storage areas as soon as possible after use.

Inspection of Compressed Gas Cylinders

V & O Services Inc. shall determine that compressed gas cylinders under its control are in a safe condition to the extent that this can be determined by visual inspection. Visual and other inspections shall be conducted as prescribed in the Hazardous Materials Regulations of the Department of Transportation (49 CFR parts 171-179 and 14 CFR part 103). Where those regulations are not applicable, visual and other inspections shall be conducted in accordance with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962. Some elements include, but are not limited to:

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- Hoses and connections should be inspected regularly for damage. Hoses should be stored in cool areas and protected from damage.
- These owned cylinders shall be visually inspected prior to charging, before each use and at least annually.
- All inspections and testing must be documented.

High Pressure Cylinders are those cylinders marked for service pressures of 900 psi and greater.

- High pressure cylinders shall be taken out of service and submitted for re-qualification testing when any of the following conditions are identified by visual inspection.
- Cuts, dings, gouges, dents bulges, pitting, neck damage or evidence of exposure to fire.
- The cylinders shall be inspected and retested according to the requirements stated in 49 CFR 180.205 and .209.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Low Pressure Cylinders are those cylinders marked for service pressures of less than 900 psi.

- Low pressure cylinders fall into two categories, those requiring requalification and those that do not require re-qualification.
- Low pressure cylinders that do not require re-qualification shall be taken out of service and condemned when any of the following conditions are identified during inspection:
- The tare weight of the cylinder is less than 90% of the stamped on weight of the cylinder.
- Observed pitting, dents, cuts, bulging, gouges or evidence of exposure to fire.
- Low pressure cylinders subject to re-qualification shall be taken out of service, inspected and retested when visual inspection identifies any of the following conditions; dents, bulges, pitting or neck damage.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Leaking Cylinders


Leaking cylinders should be moved promptly to an isolated, well-ventilated area, away from ignition sources. Soapy water should be used to detect leaks. If the leak is at the junction of the cylinder valve and cylinder, do not try to repair it. Contact the supplier and ask for response instructions.

Transportation

Cylinders must be transported in a vertical secured position using a cylinder basket or cart and must not be rolled. Regulators should be removed and cylinders capped before movement. Cylinders should not be dropped or permitted to strike violently and protective caps are not used to lift cylinders.


Empty Cylinder Marking

Cylinders should be marked as "MT" and dated when empty. Never mix gases in a cylinder and only professionals should refill cylinders. Empty cylinders must be handled as carefully as when filled.

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Engineering Controls

Engineering controls such as emergency shutoff switches, gas cabinets and flow restrictors should be used wherever possible to control hazards. Emergency eyewash facilities should be present where corrosive gases or materials are used.

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Purpose

The purpose of this program is to ensure that we verify our subcontractor's competencies, establishes oversight methods and monitoring of their work in order to ensure safe and environmentally compliant work is performed at all times.

Scope

This program applies all V & O Services Inc. locations that use subcontractors.

General Requirements

The use of subcontractors must be pre-approved by V & O Services Inc. in accordance with our Subcontractor Management Plan and this program. Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics.

Subcontractor Relations Requirements

Competency Requirements

Subcontractors must be competent and capable to perform their assigned duties in a safe and environmentally sound manner. A verification process must be conducted to ensure that on-site subcontractors are competent and capable of performing their assigned duties in a safe and environmentally sound manner. The V & O Services Inc. manager hiring any subcontractor is accountable for verifying the written preapproval of the subcontractor per the Subcontractor Management Plan prior to any work being performed by the subcontractor. This includes a review of the subcontractor's safety history, safety program, insurance, etc.

Subcontractors must have the appropriate licenses, registrations, and insurance to complete their work. A verification process must be completed to ensure that on-site subcontractors have the appropriate licenses, registrations, and insurance to complete their work. The scope of work for the subcontractor will include a list of documentation required to meet regulatory and client requirements appropriate to the subcontracted work. The V & O Services Inc. manager hiring any subcontractor is accountable for obtaining, verifying and keeping copies of all required and appropriate documentation prior to any work being allowed to start by the subcontractor.

Communications Requirements

Prior to the start of work V & O Services Inc. and any subcontractor will establish clear lines of communication that includes an

effective reporting relationship. The aim of this process is to improve HSE performance by facilitating the interface of V & O Services Inc. activities with those of the client, other contractors and subcontractors. Pre-work or project kickoff meetings shall be held before work starts and be documented to ensure the subcontractor is completely aware of the reporting and communications requirements between V & O Services Inc., its client and the subcontractor.

Prior to the start of work V & O Services Inc. and any subcontractor must and will define clear roles and responsibilities. Aligning the various interests and areas of responsibility requires good working relationships between the client, contractors and subcontractors. This is particularly true if the subcontractor activities are difficult to monitor (e.g. distributed work groups, remote locations, transportation). The roles and responsibilities of V & O Services Inc., its client and the subcontractor will be included and documented in the pre-work meeting held prior to work starting.

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Emergency Planning

Prior to the start of work V & O Services Inc. and any subcontractor will establish an emergency action plan. Prior to the start of work V & O Services Inc. and any subcontractor will communicate the emergency response procedures and capabilities. V & O Services Inc. should contact all subcontractors to ensure their roles in emergency response plans are known. Subcontractors must follow emergency planning requirements for any V & O Services Inc. client location.


Oversight

An appropriate level of oversight and monitoring must and will be put in place to verify subcontractor performance for the life of the contract. V & O Services Inc. should periodically review the HSE performance of all subcontractors and verify compliance with regulatory and work-specific requirements, safety key performance indicators and other agreed upon requirements.

V & O Services Inc. and each subcontractor shall meet no less than every 3 months and at the end of the project to formally evaluate the subcontractor's regulatory and work-specific compliance and performance. The meeting shall be documented and if the client wishes to attend an invitation will be sent to the appropriate client representative.

In addition, subcontractors are required to follow or implement the work practices and systems described below while performing work at V & O Services Inc. or client worksites:

- Attend all safety orientations, included in any pre-job meeting or kick-off meeting provided by V & O Services Inc. or client prior to any work beginning
- Monitor its employees for substance abuse and report nonconformities to V & O Services Inc.
- Be included in V & O Services Inc. tailgate safety meetings, job safety analysis or hazard assessments and on the job safety inspections.
- Perform a pre-job safety inspection that includes equipment
- Report all injuries, spills, property damage incidents and near misses
- Comply with V & O Services Inc. and client safety and environment rules, policies, guidelines or procedures
- Implement V & O Services Inc. safety practices and processes as applicable
- Clean up and restore the worksite after the job is over
- Ensure compliance with regulations at all times

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Purpose

V & O Services Inc. full and part-time staff are expected to report for work fit for duty, which means able to perform their job duties in a safe, appropriate and an effective manner free from the adverse effects of physical, mental, emotional and personal problems.

Scope

This program applies to all V & O Services Inc. projects and operations.

Fitness for Duty Process

It is the goal of V & O Services Inc. to provide a safe workplace for all employees. To accomplish this goal we have adopted the following fitness for duty policy requirements. Supervisors will work with the human resources department when they have a concern about an employee's fitness for duty.

All requirements will be verified through documentation.

Pre-Employment Testing (Physical/Medical Suitability)

Employees are physically capable of performing their job function. Pre-employment physicals (medical exams) and physical evaluations are required to be included in the hiring (post-hire/pre-placement) process, and also when changing into certain job functions, transfers and different environments or in a post-injury returning to work situation (based on the severity of the injury).


Training and Safe Work Requirements (Skills and Knowledge)

Employees must have the required skills to perform their assigned tasks. This is evaluated and documented by any or all of the following for evaluation of the employee's required skills:

- Prior employment reference checks
- Certifications, licenses or other documentation verification
- Task testing
- On the job monitoring
- Performance evaluations
- Training and training retention

Employees are properly trained for their assigned tasks. Employees must receive training specific to their assigned task. Examples might be welding, instrumentation, scaffold building, equipment operator qualifications, respirator fit test, etc. based on a training matrix that reflects the job description and/or tasks being performed. All training is to be documented.

Safe work practices and procedures must be followed. Safe work procedures must be in place prior to work beginning. Employees shall follow our and our client's safety requirements. Examples may include, hot work permitting, confined space, lockout tagout, process safety management, electrical safety, operator safety and other standard work practices, safety rules or procedures.

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Personal Medical Reporting Requirements

Employees must report all medications to their supervisor they are taking that could impair their ability to work safely. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor. The reporting must occur before the employee arrives for work or arranges for transportation to a remote site.

Client Drug and Alcohol Testing Requirements

Drug and alcohol testing for pre-employment, post-accident or random as prescribed by the host facility shall be implemented. Procedures must include and be implemented for drug and alcohol testing as prescribed by DOT or the host client facilities.

Employee Activity and Behavior

We will monitor employee activities and behaviors to determine if employees should be removed from the work site based on our drug and alcohol program requirements. Employee's activities and behaviors will be monitored to determine if employee should be removed from the work site if their ability to perform their duties safely is questioned.

Fit for Duty Examination

Confidentiality

Medical Records and other related records are protected by state and federal confidentiality laws and V & O Services Inc. policy. The medical record of fitness for duty examination will be maintained in the Human Resources office. Employee medical records will not be released to unauthorized personnel without the employee's written consent or subpoena in accordance with state and federal laws.

Self-Referrals

Employees are responsible for notifying their supervisor if they are fatigued to the point of not being able to perform their duties safely. Employees must be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers.


Disciplinary action may occur for an employee reporting to work in a condition which could endanger their safety or the safety of any other person(s). See below for Management Referral in case there is a question of the employee's ability to work safely.

Management Referral

Management Personnel Responsibility

Management personnel are responsible for monitoring the attendance, performance and behavior of their employees. When an employee's performance and/or behavior (including the odor of alcohol or possible use of any illegal substance) appears to be unsafe, ineffective and/or inappropriate, it is every manager's responsibility to challenge the employee's behavior and the ability to function, remove the employee from the job, refer the employee for a Fitness for Duty exam immediately and conduct appropriate follow up.

Due to the safety issues involved, supervisors have a special responsibility to implement this policy in a consistent and fair manner.


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Procedure

- When any manager or their designee observes an employee who is not performing his/her job safely, appropriately, and effectively, or an odor of alcohol is present, or whose behavior is inappropriate, that manager is to remove the employee from her/his duty immediately and call Human Resources to continue the Fitness for Duty procedure. The employee will be referred to a medical provider for a fitness for duty exam.
- The Fitness for duty evaluation may include testing for chemical (e.g. alcohol and drug) levels, referral for psychiatric evaluation or any other evaluation or follow-up deemed necessary.
- The manager or designee must document the reasons for the fitness for duty request by recording the employee's behavior and noting the names of any witnesses who observed that behavior. Documentation must be submitted to Human Resources by the next business day.
- The employee is required to cooperate fully with the manager and medical personnel. The employee must sign consent forms for both the fitness examination and communication of its results in confidence to Human Resources. Refusal to cooperate will be considered insubordination and will be grounds for disciplinary action. The employee should be suspended pending investigation, which could result in termination.
- Medical personnel will advise Human Resources if the employee is fit or not fit for duty. The medical results of the fitness for duty exam will be communicated to Human Resources.
- If medical personnel determine that the employee is FIT FOR DUTY, the employee must contact Human Resources on the next general business day and the manager in consultation with Human Resources will determine discipline in situations where misconduct may have occurred.
- If medical personnel determine that the employee is NOT FIT FOR DUTY:
 - The manager makes every effort to arrange for safe transportation home for the employee.
 - The employee must contact Human Resources, on the next general business day.
 - The manager, in consultation with Human Resources, will determine discipline in situations where misconduct has occurred.

Subsequent Fitness for Duty Exams

Dependent upon the reason for the fitness exam, employees who violate this policy a second time may be subject to progressive discipline, up to and including termination of employment.

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Purpose

Business continuity means ensuring that essential business functions can survive a natural disaster, technological failure, human error, or other disruption. Many existing business continuity plans anticipate disruptions such as fires, earthquakes, and floods. These events are restricted to certain geographic areas and the time frames are fairly well defined and limited. Pandemic disease, however, demands a different set of continuity assumptions since it will be widely dispersed geographically and potentially arrives in waves that could last several months at a time.

Development of a Pandemic Disease Plan and the Appointment of a Coordinator

A pandemic disease plan or disease containment plan will be developed for the V & O SERVICES INC. CORPORATION and a coordinator appointed. There will be a workplace coordinator who will be responsible for dealing with disease issues and their impact at the workplace. This may include contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals.

Assumptions

A pandemic disease will spread rapidly and easily from person to person, affecting all businesses due to absenteeism. Businesses that are relied upon by other businesses will be facing the same massive absentee rates, and will be unable to provide essential components to maintain the daily operations.

Risk assessments to identify the essential/critical components of our business operation need to be conducted. Recognize that a pandemic includes:


- Healthcare services not being available (they are already full at present with the usual ailments).
- Schools, churches and other public places not being open.
- Borders are partially or fully closed, especially airports, leaving people (our families, employees, business partners, customers and suppliers) "stranded".
- Essential materials and supplies may be limited due to distribution chains that are affected by the travel restrictions or absentee workers supporting those transportation means.
- Essential services around utilities, food distribution/access and banking systems may not be at "normal levels"; access to cash flow could be tight.
- People may not be willing to or able to come to work.

Communications

Communications during a pandemic involves both internal communications and external communications. Internal communication will be provided to employees to educate them about pandemic diseases and measures they can take to be prepared.

Key contacts, a chain of communications and contact numbers for employees and processes for tracking business and employees status have been developed as described in this section.

Risk communication is critical to inform employees regarding changes in the pandemic status. The following is one method for providing such information.

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Alert: conveys the highest level of importance; warrants immediate action or attention.

Advisory: provides key information for a specific incident or situation; might not require immediate action.

Update: provides updated information regarding an incident or situation; unlikely to require immediate action.

Provide continuous updates through internal & external communications when a pandemic is imminent:

- Notification to employees of operational changes
- Provide frequent updates about the pandemic status
- Provide advisories and alerts as conditions change
- Ensure vendors and suppliers have available a dedicated communications contact
- Monitor local, state, and federal pandemic updates

We will notify key contacts including both customers and suppliers in the event an outbreak has impacted our V & O SERVICES INC. CORPORATION's ability to perform services. This procedure also includes notification to customers and suppliers when operations resume.

We will use our phone systems that can perform automatic dialing from a database with each employees contact number to send notifications and messages about alerts. The use of the V & O SERVICES INC. CORPORATION web-site also will serve as a portal for sharing information with employees and vendors.

Business Continuity Planning

During an emergency, employees look to management to provide leadership for the V & O SERVICES INC. CORPORATION. If a

large percentage of personnel become ill our business continuity plans will be initiated so that if significant absenteeism or changes in business practices are required business operations can be effectively maintained.

COMMAND STAFF:


Incident Commander (President/CEO)	Organizes and directs all aspects of the incident response
Public Information Officer (Media/Public Relations)	Creates and releases upon approval from the incident commander all information to the staff, media and public.
Liaison Officer (Vice President)	Establishes and maintains relationships with outside organizations
Safety Officer (Safety Manager)	Ensures the safety of all persons involved with the pandemic

OPERATIONS SECTION:

Operations Section Chief (Director of Operations)	Initiates and manages ongoing operations throughout a pandemic
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LOGISTICS SECTION: Logistics

Section Chief (Purchasing/Inventory Manager)	Meets the goods, services, and staffing needs of the operation during the pandemic
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PLANNING SECTION:

Planning Section Chief (Lead Administrator)	Collects information and resources potentially relevant to the pandemic and V & O SERVICES INC. CORPORATION operations
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FINANCE SECTION: Finance Section

Chief (Purchasing/Accounting Manager)	Monitors all expenditures and ensures fiscal resource availability during the pandemic
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Pandemic Response by Pandemic Phase

Currently the WHO has created various phases for a pandemic, but does not always relate to events locally.

- Level 0 (WHO Phase 3) - Novel virus alert- not human-to-human transmission
- Level 1 (WHO Phase 4) - Confirmed cases of human-to-human transmission of novel disease virus.
- Level 2 (WHO Phase 5) - Suspected/confirmed cases in the Tulsa area.
- Level 3 (WHO Phase 5) - Numerous suspected/confirmed cases in the Tulsa area.

Work At Home Considerations

There is a work-at-home and stay-at-home policy when employees are ill or are caring for others. Flexible work policies will be developed as much as possible. Employees are encouraged to stay at home when ill, when having to care for ill family members or when caring for children when schools close, without fear of reprisal. Telecommuting or other work-at-home strategies will be developed.


Infection Control Measures

Guidelines for infection control are important to clarify the routes of transmission and the ways to interrupt transmission through measures of hygiene. Infection control is an essential component of pandemic management and a component of public health measures. Essential measures include:

- Hand washing and use of hand sanitizers shall be encouraged by V & O SERVICES INC. CORPORATION supervision.
Hand washing facilities, hand sanitizers, tissues, no touch trash cans, hand soap and disposable towels shall be provided by V & O SERVICES INC. CORPORATION.
- Workers are encouraged to obtain appropriate immunizations to help avoid disease. Granting time off work to obtain the vaccine is considered when vaccines become available in the community.
- Social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings will be considered.
- We will clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) routinely and when visibly soiled. Work surfaces will also be cleaned frequently using normal cleaning products.

Additional examples of infection control measures include:

- Stay at home when you are sick. If possible, stay away from work, school and from running errands. You will help others from catching your illness.
- Cover your coughs and sneeze into tissue, or cough into your shirt sleeve.

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- Enhance existing housekeeping service by wiping down and disinfecting work areas (i.e. keyboards, telephones, desks, etc.) frequently.
- Enhance housekeeping services for general public use areas several times throughout the work period.
- Use personal protective equipment where appropriate to minimize exposure (i.e. gloves- for handling money, masks- for ill employees)

Implementation, Testing, and Revision of the Plan

The plan and emergency communication strategies will be periodically tested (at least annually) to ensure it is effective and workable.


Testing the plan will be accomplished by conducting exercises. Exercises range from low stress to full scale, hands on drills. A tabletop exercise is the easiest way to begin testing the plan. This type of exercise involves having discussions regarding a scenario that challenges the plan and the decision makers during an emergency. Functional exercises take on an additional level of complexity, in that they actually require participants to conduct functional components of the plan. This usually involves planning specific scenarios, creating pretend data and present issues that target an area within the plan to be tested.

Each of these methods of testing the plan requires extensive planning for the exercise and the evaluation. The evaluation is critical to revising the plan, by capturing actual responses during the exercise or drill objectively. Once this data is captured, an after-action report with recommendations to revising the plan should be completed within a few weeks of the exercise.

Training

Employees will be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease and when it is appropriate to return to work after illness. Disease containment plans and expectations should be shared with employees. Communicating information with non-English speaking employees or those with disabilities must be considered.

Documentation of all training is required.

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The purpose of Process Safety Management is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries, etc.

V & O Services Inc. is required to recognize and participate as a contract employer at client locations with PSM Programs in place. V & O Services Inc. as a contractor has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows:

- V & O Services Inc. has a responsibility (as the contractor) to train all employees necessary to perform their job.
V & O Services Inc. shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.
- V & O Services Inc. (the contract employer) shall assure that each contract employee is instructed in the known potential fire, explosion or toxic release hazards related to his/her job and the process and the applicable provisions of the emergency action plan. V & O Services Inc. shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.
- Training shall be documented. Records which contain the identity of the contract employee, the date of training and the means used to verify that the employee understood the training must be maintained.
- Employee Evaluation Program – All employees will be evaluated to ensure required training, participation and knowledge of the client’s PSM requirements are completed and documented.
- V & O Services Inc. shall assure that each contract employee follows the safety rules of the facility including the safe work practices required with 1910.119(f)(4).
- V & O Services Inc. (the contract employer) shall advise the host employer of any hazards found or unique hazards presented by the contract employer's work. V & O Services Inc. shall advise the host employer of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.
- Trade secret information and confidentiality of trade secret information - All contract employers must respect the confidentiality of trade secret information when the process safety information is released to them.

Process Safety Information

V & O Services Inc. employees shall participate in all as directed client PSM requirements, including:


- | | |
|------------------------------------|----------------------------------|
| • Employee Participation; | Process Safety Information (PSI) |
| • Process Hazards Analysis (PHA) | Operating Procedures |
| • Training /Employee Evaluation | Contractors |
| • Pre-Startup Safety Review (PSSR) | Mechanical Integrity |
| • Hot Work Permits | Management of Change (MOC) |
| • Incident Investigation | Emergency Planning and Response |
| • Compliance Audits | Trade Secrets |

V & O Services Inc. Duties

The host employer’s safe work practices must be followed during operation such as lockout/tagout, confined space entry, opening process equipment or piping and control over entrance to facility. V & O Services Inc. employees shall abide by the host employers safe work practices during operations such as lockout/tagout, confined space

entry, opening process equipment or piping and controls over entrance to facility.

To comply with 1910.119(f)(4), V & O Services Inc. employees are required to complete all required documentation for any

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permit-required activities.

Hot work permits and hot work shall not be performed until hot work permit is obtained from the employer. Contract employees shall not perform hot work until a hot work permit is obtained from host employer. The permit shall document that the fire prevention and protection requirements in have been implemented prior to beginning the hot work operations.

In the event V & O Services Inc. becomes the sole operator of a facility, the existing PSM Program for that facility may be amended and adopted or, in the absence of a PSM Program, an assessment will be required prior to assuming operating responsibilities.

Reporting Incidents and Near Misses

V & O Services Inc. employees must immediately report all accidents, injuries and near misses. An incident investigation shall be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained 5 years.

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Purpose

- To provide guidelines for identifying, assessing and controlling workplace hazards;
- To ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace;
- To identify the jobs/tasks which require risk assessment.

Key Responsibilities

As specified within this program.

V & O Services Inc. must assess a work site and identify existing or potential hazards before work begins at the work site or prior to the construction of a new work site

Hazard and Risk Identification

The hazard identification process is used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable.


The Safety Manager shall conduct a baseline worksite hazard assessment which is a formal process in place to identify the various tasks that are to be performed and the accompanying identified potential hazards. The results are included in a report of the results of the hazard assessment and the methods used to control or eliminate the hazards identified. The hazard assessment report must be signed and have the date on it.

Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work;
- Legal and other requirements;
- Previous incidents and non-conformances;
- Sources of energy, contaminants and other environmental conditions that can cause injury;
- Walk through of work environment;

Hazards identifications (as examples) are to include:

- Working Alone
- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Musculoskeletal Disorders
- Bloodborne Pathogens
- Confined Spaces
- Driving
- General Safety Precautions
- And any other established policy or procedure by V & O Services Inc.
- Any other site specific work scope

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V & O Services Inc. has a formal process for identifying potential hazards. Processes are in place to identify potential hazards by the use of JSA's, JHA's, facility wide or area specific analysis/inspections.

All identified hazards are assessed for risk and risk controls are assigned within the worksite hazard assessment for that specific hazard.

Employees and/or sub-contractors are actively involved in the hazard identification process. The V & O Services Inc. program provides processes to ensure employees and/or sub-contractors are actively involved in the hazard identification process and hazards are reviewed with all employees concerned.

Employees are trained in the hazard identification process. Employees will be trained in the hazard identification process including the use and care of proper PPE.

Unsafe hazards must be reported immediately and addressed by the supervisor. The supervisor discusses the worksite hazard assessment with employees at the respective work location during the employee's documented orientation.

Review of Hazard Assessment

Existing worksite hazard identifications are formally reviewed annually or repeated at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions and specifically updated when new tasks are to be performed that have not been risk assessed, when a work process or operation changes, before the construction of a new site or when significant additions or alterations to a job site are made.

The respective supervisor or project manager advises the Safety Manager when additional hazards are introduced into the work place in order to revise planning and assessment needs.

Risk Assessment

Hazards are classified and ranked based on severity. The program identifies hazards are classified/prioritized and addressed based on the risk associated with the task. (See the risk analysis matrix outlining severity and probability).



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**V & O SERVICES INC. RISK
ASSESSMENT MATRIX**

Severity	CONSEQUENCE				PROBABILITY				
	People	Assets	Environment	Reputation	A	B	C	D	E
					Not Done	Rarely	Once a week	Several Times in a Week	Multiple Times in a Day
0	No health effect	No damage	No effect	No impact					
1	Slight health effect	Slight damage	Slight effect	Slight impact					
2	Minor health effect	Minor damage	Minor effect	Limited impact					
3	Major health effect	Localized damage	Localized effect	Considerable impact					
4	Single fatality	Major damage	Major effect	National impact					
5	Multiple fatalities	Extensive damage	Massive effect	Global impact					

Key	Manage for continuous improvement (Low)	Incorporate risk reduction measures (Medium)	Intolerable (High)
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Risk Controls/Methods to Ensure Identified Hazards Are Addressed and Mitigated

The following describes how identified hazards are addressed and mitigated:

- Risk assessed hazards are compiled with and addressed and mitigated through dedicated assignment, appropriate documentation of completion, and implemented controls methods including engineering or administrative controls and PPE required into the worksite hazard assessment of the site specific HSE plan. No work will begin before the worksite assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.
- If an existing or potential hazard to workers is identified during a hazard assessment V & O Services Inc. must take measures to eliminate the hazard, or if elimination is not reasonably practicable, control the hazard. If reasonably practicable, V & O Services Inc. must eliminate or control a hazard through the use of engineering controls. If a hazard cannot be adequately controlled using engineering controls, V & O Services Inc. must use administrative controls that control the hazard to a level as low as reasonably achievable. If the hazard cannot be adequately controlled using engineering and/or administrative controls, V & O Services Inc. must ensure that the appropriate personal protective equipment (PPE) is used by workers affected by the hazard. V & O Services Inc. may use a combination of engineering controls, administrative controls, and personal protective equipment if there is a greater level of worker safety because a combination is used.

Emergency Control of Hazards

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. V & O Services Inc. will make every possible effort

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to control the hazard while the condition is being corrected or under the supervision of client emergency response personnel in every emergency.

Certification of Hazard Assessment

The Safety Manager completes and signs the certification of hazard assessment for the worksite hazard assessment (also see PPE Program) and includes it within the site specific HSE plan. Hazard assessments are reviewed annually and updated when new tasks are to be performed that have not been risk assessed.

Job Safety Analysis (JSA)

For those jobs with the highest injury or illness rates, jobs that are new to our operation, jobs that have undergone major changes in processes and procedures or jobs complex enough to require written instructions will have a Job Safety Analysis performed. Completed JSAs are available from the Safety Manager.


Site Specific HSE Plan (SSSP)

Each work location has a site specific HSE plan. Each employee reporting to a location shall receive a documented orientation from a V & O Services Inc. supervisor that includes the SSSP for that site. The SSSP contains the V & O Services Inc. Health and Safety Policy, site specific safety requirements as well as a PPE matrix and a signed site specific worksite hazard assessment for that location, which the V & O Services Inc. has a responsibility to provide.

Review Process

The hazard assessment program will be reviewed to ensure no new hazards derived from the corrective measures. The review shall include a management of change consideration as well.

The safety committee shall be involved in the review process as well.

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WORKSITE HAZARD ASSESSMENT FORM

CERTIFICATE OF HAZARD ASSESSMENT STATEMENT FOR form shall be signed SITE

I certify a worksite hazard assessment was performed for this facility on date by the V & O Services Inc. Safety Manager.
(Signature on File)

Task: Indicate Task Group *(Additional Tasks shall be listed in each site specific HSE plan)*


TASKS	RISK LEVEL	HAZARDS	ENGINEERING OR ADMINISTRATIVE CONTROLS	PPE (Refer to PPE Matrix)
<i>List individual task</i>	<i>Use Risk Matrix</i>	<i>Identify hazards associated with task</i>	<ul style="list-style-type: none"> • <i>List procedures that apply</i> • <i>List appropriate engineering controls</i> • <i>List procedures or other administrative controls</i> 	<i>List appropriate PPE</i>
<u>Example:</u> Washing Parts	MED	Chemical Exposure (Skin, Eyes, Body)	<ul style="list-style-type: none"> • V & O Services Inc. PPE Procedure • No smoking; 	Chemical gloves, splash proof goggles chemical apron
			•	
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INSTRUCTIONS FOR COMPLETING THE JOB SAFETY ANALYSIS FORM

Select an employee to help you with the JSA: someone who is experienced in the job, willing to help and a good communicator. The employees play an important role in helping you identify job steps and hazards. In summary, to complete this form you should consider the purpose of the job, the activities it involves, and the hazards it presents. In addition, observing an employee performing the job, or “walking through” the operation step by step may give additional insight into potential hazards. Here’s how to do each of the three parts of a Job Safety Analysis:

SEQUENCE OF BASIC JOB STEPS	POTENTIAL HAZARDS	RECOMMENDED ACTION OR PROCEDURE
<p>Examining a specific job by breaking it down into a series of steps or tasks, will enable you to discover potential hazards employees may encounter.</p> <p>Each job or operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity, change in direction or movement.</p> <p>Picking up the box from the conveyor and placing it on a hand truck is one step. The next step might be to push the loaded hand truck to the storage area (a change in activity). Moving the boxes from the truck and placing them on the shelf is another step. The final step might be returning the hand truck to the receiving area.</p> <p>Be sure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the casters on the hand truck. However, if that step is generally part of the job it should be listed.</p>	<p>A hazard is a potential danger. The purpose of the Job Safety Analysis is to identify ALL hazards – both those produced by the environment or conditions and those connected with the job procedure. To identify hazards, ask yourself these questions about each step:</p> <p>Is there a danger of the employee striking against, being struck by, or otherwise making injurious contact with an object?</p> <p>Can the employee be caught in, by or between objects? Is there a potential for slipping, tripping, or falling?</p> <p>Could the employee suffer strains from pushing, pulling, lifting, bending, or twisting?</p> <p>Is the environment hazardous to safety and/or health (toxic gas, vapor, mist, fumes, dust, heat, or radiation)?</p> <p>Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards – the actions, conditions, and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents.</p>	<p>Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury or occupational illness.</p> <p>Begin by trying to: (1) engineer the hazard out; (2) provide guards, safety devices, etc.; (3) provide personal protective equipment; (4) provide job instruction training; (5) maintain good housekeeping; (6) ensure good ergonomics (positioning the person in relation to the machine or other elements).</p> <p>List the required or recommended personal protective equipment necessary to perform each step of the job.</p> <p>Give a recommended action or procedure for each hazard.</p> <p>Serious hazards should be corrected immediately. The JSA should then be changed to reflect the new conditions.</p> <p>Finally, review your input on all three columns for accuracy and completeness with affected employees. Determine if the recommended actions or procedures have been put in place. Re-evaluate the job safety analysis as necessary.</p>

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		Initial Issue Date	05/08/2014
STOP WORK AUTHORITY		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Section 59 Page 1 of 2

Purpose

The Stop Work Authority process involves a stop, notify, correct and resume approach for the resolution of a perceived unsafe condition, act, error, omission or lack of understanding that could result in an undesirable event. All V & O Services Inc. employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health, safety or environmental risks exist.

Scope

This program applies to all V & O Services Inc. projects and operations.

Key Responsibilities

- Employees are responsible to initiate a Stop Work Intervention when warranted and management is responsible to create a culture where SWA is exercised freely.
- Supervisors are responsible to ensure a culture is created where SWA is exercised and honored freely to resolve issues before operations resume and recognize proactive participation.
- Management must establish and support clear expectations to exercise SWA, create a culture where SWA is exercised freely and hold those accountable that chose not to comply with established SWA policies.

Stop Work Authority Procedure


- When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected personnel and supervision of the stop work issue, correct the issue and resume work when safe to do so.
- No work will resume until all stop work issues and concerns have been adequately addressed.
- Any form of retribution or intimidation directed at any individual or V & O Services Inc. for exercising their right to issue a stop work authority will not be tolerated by the host nor by V & O Services Inc..

Follow-Up

- All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.
- Stop Work reports shall be reviewed by supervision order to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learning.
- It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.

Training

Employees shall receive Stop Work Authority training before their initial assignment. The training will be documented including the employee name, the dates of training and subject matter.

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STOP WORK FORM

Section 1: Stop Work Issuance			
Location of operation		Date & Time	
Supervisor		Phone	
Person initiating stop work			
Person performing work			
Work operation or condition (include names of individuals performing work)			
Hazard (as stated by person initiating stop work)			

Section 2: Date / Time Informed			
Supervisor		Safety Manager	
Area Manager		Client Safety (If required)	

Section 3: Follow-up Action (Be specific – what by, who by, when by to correct hazard)			

Section 4: Restart Concurrence			
Supervisor		Date	
Area Manager		Date	
Safety Manager		Date	

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SUBCONTRACTOR MANAGEMENT PLAN (SMP)		Revision Date:	3/19/2018
		Revision No.	1
		Next Review Date:	4/1/2021
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Purpose

The purpose of this program is to ensure that V & O Services Inc. continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection and development of our subcontractors.

Scope

This program applies all V & O Services Inc. locations that use subcontractors.

General Requirements

All V & O Services Inc. subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by V & O Services Inc.. Approval requirements include:

- A formal safety review of the subcontractor being performed by V & O Services Inc. safety department.
- The scope of the review was commensurate with the hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations and requirements of V & O Services Inc..
- The subcontractor agrees to abide by our Drug and Alcohol policy and onsite safety rules throughout the duration of the work.

Any subcontractor that has a "Non-Approved" safety status will not be used on any V & O Services Inc. site.

Procedure


Pre-Qualification of Subcontractors

Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics. V & O Services Inc. will use a combination of safety metrics to prequalify subcontractors as shown below.

How Acceptable Safety Metrics, Such as TRIR, EMR, DART and Fatality Rate Will be Used as a Criteria for Selecting Subcontractors

Acceptable safety metrics will be used as criteria for prequalifying and selecting subcontractors in the following manner. Key performance indicators such as the TRIR, EMR, DART and Fatality rates shall be reviewed (see form). The safety metrics and scoring will consider:

- V & O Services Inc. Subcontractor Safety Pre-Qualification Form responses and subcontractor safety program documents review 60% (Rated from 0-60 total points)
- Subcontractor safety training documents review 20% (Rated from 0-20 total points)
- Subcontractor safety statistics review 20% (Rated from 0-20 total points)

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Evaluation Rating and Acceptance

The subcontractor rating system will have five designations:

- Equal to or Greater than 90 points = A – no restrictions.
- Between 85 and 89 points = B – Mitigation plan must be documented and approved by V & O Services Inc. Safety.
- Between 81 and 84 points = C – Mitigation plan must be documented and approved by V & O Services Inc. Safety;
management approval in writing.
- Between 71 and 80 points = D – Mandatory commitment meeting with senior subcontractor management present; mitigation plan documented and approved by V & O Services Inc. Safety; management approval in writing; trained subcontractor safety personnel on site during work regardless of number of workers.
- Less than 70 points = F – not to be used.

Once each subcontractor has been evaluated and scored, V & O Services Inc. safety will provide management the scores/ranking.

V & O Services Inc. reserves the right to change a subcontractor’s status to “Non-Approved” if the subcontractor shows insufficient progress towards accepted mitigation plan or other agreed upon criteria.

Subcontractor Involvement

Contractors are required to follow or implement the work practices and systems described below while performing work at V & O Services Inc. worksites:

- Attend an safety orientation, included in any pre-job meeting or kick-off meeting provided by V & O Services Inc. prior to any work beginning
- Monitor employees for substance abuse and report nonconformities to V & O Services Inc.
- Ensure personnel have the required training and competency for their work
- Included in V & O Services Inc. tailgate safety meetings, job safety analysis or hazard assessments and on the job safety inspections.
- Perform a pre-job safety inspection that includes equipment
- Participate in the BBS hazard reporting system
- Report all injuries, spills, property damage incidents and near misses
- Comply with onsite and Owner Client safety rules
- Implement V & O Services Inc. safety practices and processes as applicable
- Clean up and restore the worksite after the job is over
- Ensure compliance with regulations at all times
- Post job-safety performance reviews - shall be conducted for subcontractors based on their adherence to the above requirements, safety key performance indicators and other agreed upon requirements.



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SUBCONTRACTOR SAFETY PRE-QUALIFICATION FORM

GENERAL INFORMATION

1. Subcontractor Information:			
Subcontractor Name:		Telephone Number:	
Street Address:		Fax Number:	
City:		Website Address:	
Province/State:		Postal Code/Zip:	
2. Officers			
President:			
Vice President:			
Treasurer:			
3. How many years has your organization been in business under your present firm's name?			
4. Parent Firm Name:			
City:	Province/State:	Postal Code/Zip:	
Subsidiaries:			
5. Under current management since (Date): (please enter date as mm/dd/yyyy)			
6. Contact for Insurance Information:			
Title:	Telephone:	Fax:	Email:
7. Insurance Carrier(s):			
Name	Type of Coverage	Telephone	
8. Worker's Compensation Account Status (Please enclose a copy of your workers compensation insurance certificate.			
Account Number:		Industry Code:	
9. Contact for requesting bids:			
Title:	Telephone:	Fax:	Email:
10. Contractor Evaluation form completed by:			
Title:	Telephone:	Fax:	Email:



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HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE

Health, Safety and Environmental Performance

Provide the following data for your firm using your record keeping forms from the past three (3) years.
If the data is not available please reply with **Not Available - N/A**.

Safety Performance Definitions and Guidance

- a. **Hours Worked** - Employee hours worked last three years. Please report actual scheduled total hours worked and total overtime hours worked. If actual hours worked are not available for certain individuals hours worked may be estimated. A default of 2000 hours per individual per year can be used as an estimate.
- b. **Recordable Incidents** - Recordable cases are those that involve any work-related injury or illness, including death but excluding first-aid injuries.
 - **Medical Treatment Case**
 - ◇ Treatment above first aid level – See OSHA recordkeeping guidelines.
 - **Days Away from Work Case**
 - ◇ Could not perform any work.
 - ◇ The day of the incident is not counted as a Days Away day nor day of return. Stop count when total days reach 180 or if employee leaves the firm.
 - **Restricted Work Case**
 - ◇ Could not perform routine functions associated with their permanent job.
 - ◇ The day of the incident nor day of return to regular position is not counted as a Restricted Duty day. Stop count when total restricted duty days reach 180 or if employee leaves the firm.
 - **Transferred Work Activity Case**
 - ◇ Assigned to another job on a temporary or permanent basis.
 - ◇ The day of the incident is not counted as a Restricted Duty day. Stop count when transferred days reach 180 or if employee leaves the firm.
 - **Fatality Case**
 - ◇ Employee dies from a work related injury or illness.
- d. **Motor Vehicle Incident** - Includes any event involving a motor vehicle that is owned, leased or rented by the firm that results in death, injury or property damage unless the vehicle is properly parked.

Health and Safety Incidents	2011	2010	2009
a. Workers Compensation Experience Modification Rate (EMR)			
b. Total Hours Worked			
Total Medical Treatment Cases			
Total Days Away Injury/Illnesses Cases			
Total Restricted Work Injury/Illnesses Cases			
Total Transferred Work Injury/Illnesses Cases			
Total Fatality Cases			
c. Total Recordable Cases			
c. Total Recordable Incident Rate (TRIR) Total # Recordable Incidents x 200,000 Total # Hours worked			



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HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE			
Health and Safety Incidents - continued	2011	2010	2009
f. Motor Vehicle Incidents (MVI) # Motor Vehicles Incidents # Kilometers/Miles driven			
g. Motor Vehicle Incident Frequency Rate (MVIFR) <u>Total # of Firm's Motor Vehicle Incidents x 1,000,000</u> Total # Kilometers/Miles driven			
Environmental Incidents	2011	2010	2009
Total # Spills to Water			
a. Petroleum Spills # spills Sheen (est. volume as 0.1 bbl. To < 1bbl. # spills 1 bbl. To < 100 bbls. # spills 100 bbls. or more			
b. Chemical Spills # spills 1 bbl./160 kg. to < 100 bbls./16,000 kg. # spills 100 bbls./16,000 or more			
Total # Spills to Land			
a. Petroleum spills # spills 1 bbl. To < 100 bbls. # spills 100 bbls. or more			
b. Chemical Spills # spills 1 bbl./160 kg. to < 50 bbls./8,000 kg # spills 50 bbls./8,000 kg. or more			
Enforcement Actions	2011	2010	2009
Citations # Health and Safety # Environmental Please provide details			
Fines Total # Fines Total \$\$ Paid Please provide details			



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Highest ranking HSE professional in the firm:

Name/Title:

Email:

Telephone Numbers

Do you have a written Basic Safety / HSE Program?

Yes

No

Does your Basic Safety/HSE Program include the following?

- a. HSE Policy statement signed by management
- b. Management Involvement and Commitment
- c. Hazard Identification and Risk Control
- d. Rules and Work Procedures
- e. Training
- f. Communications
- g. Incident and Accident Reporting and Investigation

- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes

- No
- No
- No
- No
- No
- No
- No

Does the program include work practices and procedures such as?

- a. Permit to Work including Isolation of Energy
- b. Confined Space Entry
- c. Injury and Illness Recording
- d. Fall Protection
- e. Personal Protective Equipment
- f. Portable Electrical/Power Tools
- g. Motor Vehicle/Driving Safety
- h. Compressed Gas Cylinders
- i. Electrical Equipment Grounding Assurance
- j. Powered Industrial Vehicles (Cranes, Forklifts, Etc.)
- k. Housekeeping
- l. Accident/Incident Reporting and Investigations
- m. Unsafe Condition Reporting
- n. Emergency Preparedness, Including Evacuation Plan
- o. Waste Disposal and Pollution Prevention
- p. Regular Workplace Inspection / Audits

- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes
- Yes

- No
- No
- No
- No
- No
- No
- No
- No
- No
- No
- No
- No
- No
- No
- No
- No

Do you have a Drug and Alcohol program?

- a. Pre-employment Testing
- b. Reasonable Cause Testing
- c. Post-rehabilitation/Return to Work Testing

- Yes
- Yes
- Yes
- Yes

- No
- No
- No
- No



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Do you have a Job Safety Analysis (JSA) process in place?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is there a Root Cause Analysis process used for investigations, near misses, environmental spills?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Is there a Management of Change (MOC) Process in place?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you have programs for the following?		
a. Respiratory Protection	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. Where applicable, have employees been:		
• Trained	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Fit tested	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Medically approved	Yes <input type="checkbox"/>	No <input type="checkbox"/>
c. Hazard communication/WHMIS	Yes <input type="checkbox"/>	No <input type="checkbox"/>
d. Programs for potential high hazard work such as Highly Hazardous Chemicals; Explosives and Blasting Agents	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Do you have a corrective action process for addressing individual/employee safety and health performance deficiencies?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Medical		
a. Do you conduct medical examinations for:		
• Pre-placement Job Capability	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Pulmonary	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Respiratory	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. Describe how you intend to provide first aid and other medical services while on-site.		
Do you have personnel trained to perform first aid and CPR?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Personal Protective Equipment (PPE)		
a. Is applicable PPE provided for employees?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
b. Do you have a program to assure that PPE is inspected and maintained?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
HSE Meetings		Frequency
a. Do you hold site HSE meetings for?		
• Field Supervisors	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Employees	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• New Hires	Yes <input type="checkbox"/>	No <input type="checkbox"/>
• Subcontractors	Yes <input type="checkbox"/>	No <input type="checkbox"/>



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Inspections and Audits			Frequency
a. Do you conduct internal HSE Inspections?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Do you conduct internal HSE program audits?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Are corrections or deficiencies to internal HSE program or equipment communicated and documented until closure?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Equipment and Materials:			
a. Do you own or lease Equipment and Materials? If yes, please complete the following questions:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
b. Do you have a system for establishing applicable health, safety, and environmental specifications for acquisition of materials and equipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Do you conduct inspections on operating equipment (e.g., cranes, forklifts) in compliance with regulatory requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
d. Do you maintain operating equipment in compliance with regulatory requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
e. Do you maintain the applicable inspection and maintenance certification records for operating equipment?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
f. Do you document corrections or deficiencies from equipment inspections and maintenance?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
Subcontractor Management			
a. Do you subcontract any work? If the answer is yes, please complete the following questions:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	
b. Do you have a written contractor safety management process?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
c. Do you use HSE performance criteria in selection of subcontractors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
d. Do you evaluate the ability of subcontractors to comply with applicable HSE requirements as part of the selection process?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
e. Do your subcontractors have a written HSE Program?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
f. Do you include your subcontractors in:			
• HSE Orientation	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• HSE Meetings	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• HSE Equipment Inspections	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• HSE Program Audits	Yes <input type="checkbox"/>	No <input type="checkbox"/>	
• Are corrections or deficiencies documented	Yes <input type="checkbox"/>	No <input type="checkbox"/>	



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Employee and Trades Training					
a.	Have employees been trained in appropriate job skills?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
b.	Are employees' job skills certified where required by regulatory or industry consensus standards?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
c.	List trades/crafts which have been certified:				
Health, Safety and Environmental Orientation		New Hires		Supervisors	
a.	Do you have an HSE Orientation Program for new hires and newly hired or promoted supervisors?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
b.	Does the program provide instruction on the following:				
	•New worker orientation	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	•Safe Work Practices	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	•Safety Supervision	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	•Toolbox meetings	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	•Emergency Procedures	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	•First Aid Procedures	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	•Fire Protection and Prevention	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	•Safety Intervention	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	•Hazard Communication/WHMIS	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Health, Safety and Environmental Training					
a.	Do you know the regulatory HSE training requirements for your employees?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
b.	Have your employees received the required HSE training and re-training	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
c.	Do you have a specific HSE training program for supervisors?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Training Records					
a.	Do you have HSE and training records for your Employee's?	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
b.	Do the training records include the following:				
	• Employee identification	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	• Date of training	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	• Name of trainer	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
	• Method used to verify understanding	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
c.	How do you verify understanding of training? (Check all that apply)				
<input type="checkbox"/> Written test <input type="checkbox"/> Oral test <input type="checkbox"/> Performance test <input type="checkbox"/> Job Monitoring <input type="checkbox"/> Other (List)					

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PREVENTATIVE MAINTENANCE		Revision Date:	3/19/2018
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		Next Review Date:	4/1/2021
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Purpose

The purpose of the Preventative Maintenance program is to set forth the procedures for the tracking, care, and maintenance of equipment.

Scope

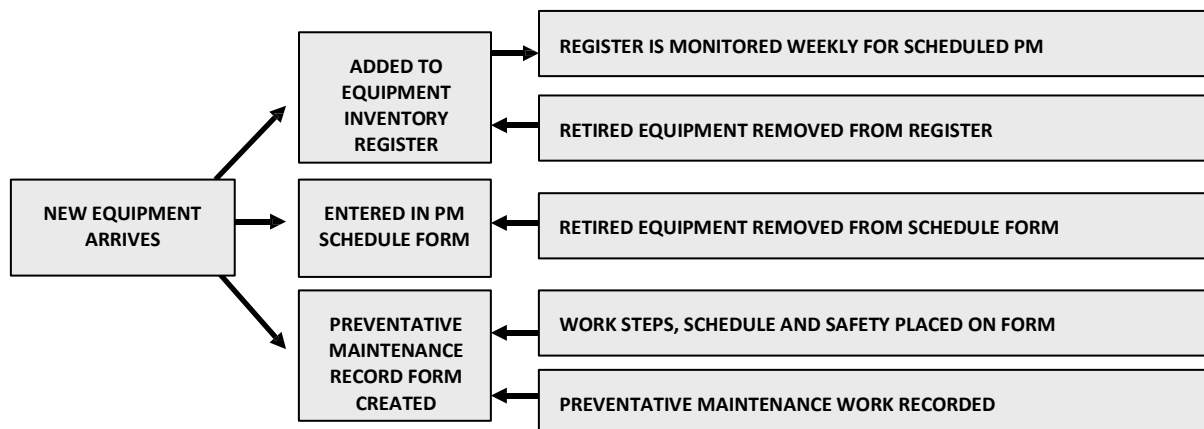
This program applies to all V & O SERVICES INC. employees and locations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers V & O SERVICES INC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Procedure

Process

As equipment arrives at the site a determination is made if the equipment should be placed on a preventative maintenance schedule based on the type of equipment, calibration requirements, etc.


To ensure equipment is tracked and preventative maintenance work is performed on a timely basis the following process is used. The site management representative is responsible for ensuring the process is followed.



All records must be legible, readily retrievable, protected and stored to prevent damage, deterioration or loss.

Equipment Inventory and Register

An equipment inventory is established and maintained. An inventory of V & O SERVICES INC. machinery/equipment has been established and must be kept current. When new machinery or equipment is acquired, it must be added to the inventory via the Equipment Inventory Register. The Equipment Inventory Register includes all equipment at a site that requires calibration or routine preventative maintenance and is updated by the designated maintenance representative for the site.

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The register contains information on equipment's:

- Description
- Make
- Model
- Serial Number
- Location
- Next Scheduled PM Date

As appropriate equipment is added to a site's inventory it is added to the register as well as equipment that is removed permanently from the site is removed from the register.

Each week the Equipment Register is reviewed for scheduled preventative maintenance for equipment at the site.

Each quarter a copy of the Equipment Register is sent to the appropriate management representative for the site.

Preventive Maintenance Inspection Schedule and Maintenance Record

A preventive maintenance and inspection schedule has been established to meet manufacturer and legislated requirements. A preventative maintenance schedule has been established based on manufacturer requirements and industry standards.

Each piece of relevant equipment on the Equipment Register is entered onto the Preventative Maintenance Schedule Form and assigned a Preventative Maintenance Record form. The maintenance schedule form contains the item name, required frequency of inspection and tracks the inspection dates and completion. The maintenance record form contains information on the equipment including:

- Equipment data
- Safety instructions for the specific equipment
- Description of preventative maintenance requirements for the specific equipment
- Preventative maintenance frequency and history for the specific equipment


Records of maintenance activities are kept. Preventive maintenance performed on machinery or equipment must be documented and retained for the life of the machinery or equipment. As scheduled preventative maintenance is performed on the equipment the Preventative Maintenance Record Form shall be completed and the Preventative Maintenance Schedule Form Updated. All forms are to be retained locally with a copy sent to the V & O SERVICES INC. main office.

Repair Procedure

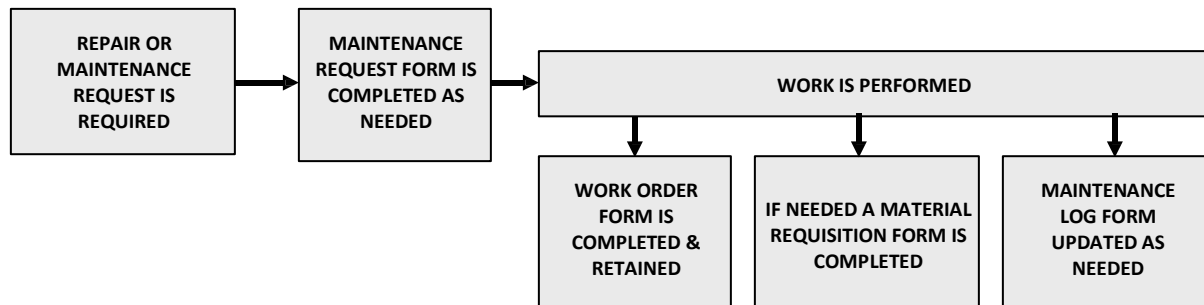
Process

Equipment found to be defective is removed from service until it is repaired. Defects observed in machinery or equipment shall be reported to a supervisor and must be repaired or replaced before being used again.

During preventative maintenance work or other requests repairs activity is tracked and documented by use of the following process.

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This process ensures documented work performed, costs and management approval for material associated with the project activity.



All records must be legible, readily retrievable, protected and stored to prevent damage, deterioration or loss.

Maintenance Request Form

Maintenance requests are originated by the client or internal requestor completing a Maintenance Request Form and submitting the form to the designated maintenance representative for the site. The form contains information regarding:

- Originators Information
- Location of the problem
- Defective equipment details
- Description of the problem or corrective action requested

Each Maintenance Request Form is to be retained in a file folder with all appropriate other documents, copies of invoices, etc. and retained locally at the site.

Work Order Form


The designated maintenance representative takes information from the Maintenance Request Form investigates the problem and documents work performed on the Work Order Form. Data contained on the Work Order Form includes:

- Maintenance Request input
- Corrective actions completed
- Manpower details
- Materials used or needed for repairs and cots

Each Work Order Form activity is then entered onto the Maintenance Log form. If equipment, parts, etc. are required the Material Requisition Form shall be completed and approved prior to purchasing.

Maintenance Log Form

The Maintenance Log contains in chronological order all Work Order activity with line item summaries of reported date, maintenance issue, location, costs and completion date.

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Each quarter a copy of the Maintenance Log is sent to the appropriate management representative for the site.

Material Requisition Form

Material is requested for and approved via the Material Requisition Form.

A purchase order is assigned by the designated maintenance representative (which must appear on all invoices).

The form is submitted to the Project Manager for review and approval.

Any single Material Requisition Form representing a single value of \$1,000 or more requires approval from senior management prior to placing any orders.

The Material Requisition Form is to be kept with all Work Order Forms.



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WORK ORDER FORM									
SECTION 1 Information received from "Maintenance Request Form"									
DEFECT DESCRIPTION & CORRECTIVE ACTION REQUIRED <small>(paste photograph below if required)</small>									
SECTION 2 To be completed by Definitive Optimization									
Location:		Date Reported:			Completion Date:				
Task Item	Corrective Action				Date	Tech Initials			
SECTION 3 MANPOWER SUMMARY LIST Manhour Details									
Task Item	Surname	ID	Craft	Start Time	Finish Time	Total Man Hrs	Date	Initials	
Total Manhours									
SECTION 4 MATERIALS SUMMARY LIST <small>Complete Material Requisition Form to order new or replacement stock</small>									
Task Item	Stock Code	Stock Description			QTY	Unit (\$)	Total Cost (\$)	Date	
Total Material Cost									
Completed By Name: <input type="text"/>				Completed By Signature: <input type="text"/>					
				Date: <input type="text"/>					
ENTER ALL WORK ON THE MAINTENANCE LOG									

MAINTENANCE REQUEST FORM									
Complete all relevant information below and email to maintenance department or designee.									
Originator Name:					Contact Phone Number:				
Location of Problem: <input style="width: 100%;" type="text"/>									
Date: <input type="text"/>					Time: <input type="text"/>				
Location of Problem: (mark x in appropriate box)									
Location 1	Location 2	Location 3	Location 4	Defective Equipment - Facility Details					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Equipment Type:					
				Serial Number:					
				Make:					
				Model:					
PLEASE DESCRIBE PROBLEM OR CORRECTIVE ACTION REQUESTED <small>(paste photograph below if required)</small>									

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Purpose

The purpose of this program is to meet client requirements for Safety and Environmental Management Systems (SEMS) as related to Management of Change.

Scope

V & O Services Inc. does not own any facilities on the Outer Continental Shelf or any other area governed by the Bureau of Safety and Environmental Enforcement (BSEE) and this program is created to meet client requirements.

General Requirements


- A pre-project review must be completed during the planning/development stage. Before a change to facilities, equipment, or work process has been initiated, a review shall be completed to ensure that health, safety, environmental and/or quality standards can be maintained while staying on budget.
- Prior to any change within the scope of this policy, a safety review is to be completed using the Management of Change Procedure Form.
- It is the responsibility of the individual or team proposing the change to follow this procedure and complete the safety review prior to making any changes.
- Once the review has been completed by the individual or team, it must be approved by the client, Project Manager, as well as senior overseeing V & O Services Inc. manager and V & O Services Inc. Safety Manager.
- At the completion of the change, the Project Manager and V & O Services Inc. Safety Manager shall audit the changes occurring against the approved MOC plan.

Procedure

We must make sure that changes to the way we perform work do not create safety nor environmental hazards and that we have considered how changes in one area of work will affect other areas. Areas to be addressed in a Management of Change request include:

- the technical (process and mechanical design) basis for proposed changes
- impact of a change on safety, health, and the coastal and marine environments, including as appropriate a hazards analysis
- the effects of proposed changes on separate but unrelated upstream or downstream facilities and on area wide emergency plans
- necessary time period to implement changes
- management approval procedures for changes
- necessary revisions of the operating procedures, safe work practices, and training program
- communication of a proposed change and the consequences of that change to appropriate personnel?
- the necessary revisions of the safety and environmental information
- the duration of the change, if temporary

A pre-start up review must be approved and prior to the change being put into service. Before a change to facilities, equipment, or work process can be placed into service a pre-start up review must be completed to ensure that all requirements outlined in the pre-project review have been addressed, and to ensure that any other possible hazardous conditions are assessed.

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Communication of the Proposed Change and Consequences of that Change to Appropriate Personnel

Communication of proposed changes to appropriate personnel and training for appropriate personnel whose jobs are affected by changes may be accomplished in several ways, including face-to-face briefings, formal classroom or practical training sessions, e-mails or intranet postings to employees, posted hard-copy information, handouts, or agenda topics during safety meetings. The training or communication on the change would typically be provided prior to operating the changed equipment, which may occur before the actual start-up of the process.

All affected personnel/ stakeholders participate in the Management of Change process. Pre-project and pre-start up reviews will include all interested parties. This may include, but is not limited to, Operations, Engineering, Information Technology, Sales/ Marketing, Quality Assurance, and Environmental, Health and Safety.


Procedures to Analyze Safety, Health and Environmental Considerations Involved in Proposed Changes

The MOC program must address procedures for safety and environmental considerations involved in proposed changes. These procedures include the completion of a safety, health and environmental hazard analysis of the proposed change, involvement of staff in the work, approval of client for hazard analysis of proposed change and training of any accepted change process before work begins.

MOC Procedures to be Used When Revising Operating Procedures, Safe Work Practices and Training Programs

The program addresses the necessary MOC procedures for revisions in operating procedures, safe work practices and training programs. These include:

- Utility and Energy Requirements - electrical, hydraulic, compressed air, steam, etc., piping pressures and sizes for liquid and gas supplies, all means for de-energizing utilities provided and identified.
- Hazardous Materials - names and descriptions, MSDSs, concentrations, size and type of packaging, flash point, flammable limits, storage requirements, temperatures, etc.
- Waste Disposal - waste generated, containers to be used and locations, amounts, flammability, toxicity, reactivity, ingredients, associated wastes such as gloves and rags, disposal locations, etc.
- Personal Protective Equipment - types required for hazards present or anticipated.
- Training Required - hazard communication, waste disposal, PPE, work permits, confined space, moving vehicles, cranes, fire protection, lockout/tagout, new equipment, shifts to be involved, use of temporary employees, qualifications of operators, testing of operators.
- Material Handling - lifting devices required, cranes required, weights to be handled mechanically and manually, forklift requirements, rack storage requirements, access to racks by forklifts, power requirements for lifting aids.
- Fire Protection and Emergency Procedures - access to existing fire extinguishers and fire hoses, sprinklers protected and not being obstructed, emergency response procedures.
- Walking Surfaces - Access to aisles, aisles not used for working, aisles designated, clean and smooth surfaces, floor mats, trip hazards.
- Machinery and Equipment - guarding requirements, power transmission guarding, nip points, sharp edges, foot treadles, energy sources, new equipment and tools, maintenance requirements, equipment bolted to the floor, energy isolating requirements (lockout/tagout), special tools required, automatic start or intermittent operations.
- Ergonomics - illumination, noise, worker position and posture, vibration, floor space, machine controls, repetition, force, tool use, heat and cold, emergency stop location.

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- Ventilation - airborne contaminants (vapor, gas, dusts, fumes, mists, smoke, vehicle exhaust, etc.), control, methods, amounts of emissions, local and general (dilution) ventilation, CFM, permits required.

Change in Supervisory Personnel


The Management of Change (MOC) policies and procedures are utilized whenever there is a change in supervisory personnel by ensuring they completely understand their duties, the owner client is notified of the changed supervisory personnel's qualification, arrival dates, orientation and training requirements for their position and staff under their supervision, etc. Routine personnel vacancies and replacements, rotation and shift changes should not require additional MOC action.

Training

V & O Services Inc. shall inform and train those employees whose job tasks are affected by a change in operations. The program must address training and informing employees affected by operational changes prior to startup.

Training may be formal classroom, CBT, or hands-on format, or may be in the form of reading and signing off on pertinent MOC information.

All training shall be documented and made available to the client, governmental agencies or as required by law.

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MANAGEMENT OF CHANGE PROCEDURE FORM

Purpose of Form: To verify the orderly and comprehensive review of any new or change to operations, processes, primary personnel, equipment or safety and health aspects prior to the actual change taking place. We must make sure that changes to the way we perform work do not create safety nor environmental hazards and that we have considered how changes in one area of work will affect other areas. Areas to be addressed in a change request include:

- the technical (process and mechanical design) basis for proposed changes
- impact of a change on safety, health, and the coastal and marine environments, including as appropriate a hazards analysis
- the effects of proposed changes on separate but unrelated upstream or downstream facilities and on area wide emergency plans
- necessary time period to implement changes
- management approval procedures for changes
- necessary revisions of the operating procedures, safe work practices, and training program
- communication of a proposed change and the consequences of that change to appropriate personnel?
- the necessary revisions of the safety and environmental information
- the duration of the change, if temporary

Project Location: _____ **Requestor:** _____

Are Changes Required in These Areas?	YES	NO
Equipment		
Operating Procedures		
Materials		
Operating Conditions		
Personnel Changes		
Safe Work Practices (Samples) and Related Training <ul style="list-style-type: none"> • General work permit • Opening of pressurized or energized equipment or piping • Lockout and tagout of electrical and mechanical energy sources • Hot work and other work involving ignition sources • Confined space entry • Crane operations • Bypass or removal from service of a safety feature. • Electrical/high voltage safety. • Use of pressurized gas cylinders • Fire protection system impairment • Elevated work/fall protection including over or near water • Hot tapping of lines and equipment 		



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Are Changes Required in These Areas?

YES	NO
-----	----

<ul style="list-style-type: none"> • Hydroblasting • Mobile work platforms • Scaffold use • Underwater maintenance or construction 		
--	--	--

Other (Describe)		
------------------	--	--

If you answered 'Yes' to any of the issues above, explain the proposed changes, effect and implementation process before the change is made below:

Submitted by: _____

Date: _____

Review/Approval:

Supervisor: _____

Date: _____

Project Manager: _____

Date: _____

Safety Manager: _____

Date: _____

Client (If Needed): _____

Date: _____

Audits:

Project Manager: _____

Date: _____

Safety Manager: _____

Date: _____



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Doc No: TC-APPENDIX A

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APPENDIX A – GLOSSARY OF TERMS


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AED	Automated External Defibrillator
AGC	Associated General Contractors
COO	Chief Operating Officer
CPR	Cardio Pulmonary Resuscitation
CSD	Corporate Safety Director
DART	Days Away, Restricted, Transferred Rate
DMV	Department of Motor Vehicles
DUI	Driving Under the Influence
DWI	Driving While Intoxicated
EAP	Employee Assistance Program
EEO	Equal Employment Opportunity
EMR	Experience Modification Rate
EMS	Emergency Medical Services
EPP	Emergency Procedure Plan
ERT	Emergency Rescue Team
IR	Incident Rate/OSHA Recordable Rate
JSAR	Jobsite Safety Audit Report
LEL	Lower Explosive Limit
LOTO	Lock Out / Tag Out
MSHA	Mine Safety and Health
MUTCD	Manual of Uniform Traffic Control Devices
MSDS	Material Safety Data Sheet
NCCI	National Council for Compensation Insurance
NFPA	National Fire Protection Association
OSHA	Occupational Safety and Health Administration
PE	Project Engineer
PM	Project Manager
PD	Project Director
PPE	Personal Protection Equipment
PSP	Project Safety Person
PTSP	Pre Task Safety Plan
SA	Safety Assistant
SCBA	Self Contained Breathing Apparatus
SF	Square Foot
TBT	Tool Box Talk
TSBO	Task Specific Behavior Observation
TEAM	V & O Services Inc. Equipment and Maintenance Facility
VIN	Vehicle Identification Number
VP	ViewPoint Project Management Software

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Corporate

- A. Annual Safety Program Evaluation
- B. Minimum Safety Requirements
- C. Safety Committee Membership Guidelines
- D. Driver Acknowledgment of Policies

Medical / Drug Testing

- E. Reasonable Suspicion
- F. Post-Exposure Evaluation
- G. Hepatitis Vaccination Acceptance/Declination

Disciplinary Forms

- H. V & O Services Inc. Employee Safety Violation
- I. Subcontractor Employee Safety Violation
- J. Subcontractor Directive

Project Safety

- K. Project Difficulty Rating
- L. Site Specific Orientation Checklist
- M. Pre-Task Safety Plan (PTSP)
- N. Tool Box Talk (TBT)
- O. Tool Box Talk Schedule (sample)
- P. Job Safety Audit Report (JSAR)
- Q. Respirator Medical Evaluation (Fit Test)

Incident


- R. Incident Investigation Report –Standard
- S. Incident Investigation Report –Short Form
- T. Near Miss Reporting
- U. Light Duty Offer Letter (sample)
- V. Driver Accident Report
- W. Root Cause Report
- X. OSHA Inspection Report
- Y. Crisis Management Responsibility Listing
- Z. Crisis Management External Contact Listing
- AA. Major Injury Flowchart (site-specific sample)

General Safety Information

- BB. OSHA Fact Sheet: Subpart CC – Cranes and Derricks in Construction: Signal Person Qualification
- CC. Overhead Powerline Protocol
- DD. Critical Pick Planning Agenda

Permits

- EE. Confined Space
- FF. Critical Lifting Worksheet
- GG. Excavation Checklist

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- HH. Hot Work
- II. Lock Out / Tag Out

Equipment Inspection

- JJ. Aerial Work Platform Daily Inspection Log
- KK. Crane Operator's Daily Inspection Log
- LL. Forklift
- MM. Manbasket
- NN. Mobile Equipment Operator's Report
- OO. Scissor Lift
- PP. Skid Steer, Bobcat
- QQ. Suspended Scaffolding