DRAKE INDUSTRIES

Reclamation & Environmental Services

COMPANY SAFETY PROGRAMS AND POLICIES

TABLE OF CONTENTS

WE VALUE SAFETY

Drake Industries, LLC (the "Company" or "Drake Industries") makes safety its top priority while working on our projects. The Company trains and educates its employees regarding the safety policies, practices, and procedures discussed herein, as well as provides continuing safety education such as hands-on demonstrations of proper usage of equipment and attending safety meetings and presentations of others in the industry.

As the President of Drake Industries, I give our employees the authority to stop work or any act that appears to be unsafe. I challenge the Company's employees to accept their responsibility to work in a safe, smart, and efficient manner. The Company is dedicated to ensuring that it provides its employees with all the tools and training necessary to perform their job duties pursuant to relevant laws, regulations, policies, and other procedures as doing so creates a healthy and safe work environment for everyone involved.

The Company's goal is to have zero accidents on every project. Achieving our goal cannot be done without the participation of every employee. The Company requires its employees to work as a team to ensure that the job is being done safely, and if it is not, the Company expects its employees to immediately stop working and report the unsafe condition to a supervisor.

The Company has a comprehensive program that is a guide to be used in conjunction with Federal OSHA programs, relevant state OSHA programs, and the Company's customers' programs. In order to ensure its safety polices, practices, and procedures continue to evolve and remain compliant, this document is subject to change.

Price R. Drake
President
Drake Industries, LLC

DRAKE INDUSTRIES
Reclamation & Environmental Services

SECTION I

GENERAL EMPLOYMENT POLICIES

EQUAL EMPLOYMENT OPPORTUNITY POLICY

Our policy is to select, place, train, and promote the best qualified individuals based upon relevant factors such as work quality, attitude, and experience so as to provide equal employment opportunity for all our employees in compliance with applicable local, state, and federal laws and without regard to non-work-related factors such as race, color, national origin, ethnicity, religion, creed, sex (including pregnancy), gender identity or expression, sexual orientation, age, disability, AIDS or HIV status, genetic information, citizenship, military or National Guard status, or marital status. This equal opportunity policy applies to all Company activities, including but not limited to, recruiting, hiring, training, transfers, promotions, and benefits.

If you have a disability that you believe requires an accommodation, you need to request the accommodation in writing to the Company's President your Supervisor. Please include the nature of the disability, nature of restriction(s) and nature of accommodation(s) you request.

If you have a religious accommodation request, please make sure you request the religious accommodation in writing to Human Resources and/or your Supervisor.

ANTI-HARASSMENT, DISCRIMINATION, AND RETALIATION POLICY

A fundamental policy of the Company is that the workplace is for work. Our goal is to provide a workplace free from tensions involving matters that do not relate to the Company's business. In particular, an atmosphere of tension created by non-work-related conduct, including ethnic, racial, national origin, disability, age, sexual or religious remarks, animosity, unwelcome sexual advances or requests for sexual favors or other such conduct that does not belong in our workplace. Do not engage in inappropriate conduct or comments based on age (40 and over), race, color, national origin, ethnicity, religion, creed, sex (including pregnancy and gender), gender identity or expression, sexual orientation, age, disability (physical or mental), AIDS or HIV status, genetic information, citizenship, military or National Guard status, or marital status, or other protected categories.

Harassment, discrimination and retaliation can be a violation of state and federal laws if it is used as the basis for employment decisions or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment. The Company's policy against harassment, discrimination and retaliation is much stricter than what the law requires because we have higher standards for our employees.

Harassment, discrimination and retaliation of employees or of applicants is prohibited. Harassment and discrimination includes, without limitation: verbal (derogatory statements, slurs, teasing, jokes, epithets and innuendo); physical (sexual and personal touching, assault, physical interference with normal work or involvement); and visual (posters, cartoons, drawings, computer materials, sexual gestures).

DRUG AND ALCOHOL-FREE WORKPLACE POLICY

The Company is committed to providing a safe working environment for all employees, promoting the highest standards of employee health and productivity, and protecting the Company's reputation in the community. Employees are prohibited from being under the

influence of drugs or alcohol while on company premises or jobsites, while operating company equipment or vehicles, or while performing or conducting company business. The Company has established the following guidelines regarding it drug and alcohol free workplace policy:

1. Alcoholic beverages are not to be consumed during working hours or after hours on Company property or jobsites. This policy also pertains to any subcontractors that the Company engages. Alcohol consumption at business lunches or meetings is strongly discouraged. Individuals who drink during business lunches or meetings will be held responsible for any inappropriate conduct which may result.

2. The Company strongly endorses a drug-free workplace.

3. Illegal drugs are not to be used or distributed on Company property at any time or under any circumstances. Violation of this rule is cause for immediate dismissal.

4. The Company reserves the right to perform a test for drug or alcohol usage during working hours, in compliance with federal, state or local law. Failure to submit to such a test is grounds for immediate dismissal.

The Company maintains a policy in which job applicants and current employees may be required to submit to drug and alcohol impairment testing. This policy is intended to comply with applicable laws regarding drug and alcohol testing, maximizing safety and productivity in the workplace, while preserving the privacy and dignity of employees.

Persons Subject to Testing

This policy applies to all compensated employees and prospective employees of the Company including all compensated officers, directors, and supervisors. All current or prospective employees, officers, directors or supervisors shall be subject to testing pursuant to the terms of this policy.

Definitions

The following definitions apply for purposes of this policy:

1. "Drugs" means any substance considered unlawful under the Controlled Substances Act, 21 U.S.C. § 812, or the metabolite of the substance. "Drugs" specifically include, but are not limited to, amphetamines, barbiturates, benzodiazepines, cannabinoids (marijuana)), cocaine, methadone, methaqualone, opiates, phencyclidine, and propoxyphene.

    a. Drugs as used in this policy include synthetic drugs, as defined below.

    b. Prohibited drugs under this policy expressly includes marijuana, including any products containing THC in any form, even if used legally pursuant to applicable law (other than for medical marijuana cardholders). The Company does not recognize marijuana as a legal drug for purposes of this policy.

c. Prohibited drugs also include any natural substance that is not lawfully prescribed to the employee that is a hallucinogenic or psychoactive compound, such as psilocybin ("magic mushrooms").

2. "Alcohol" means ethanol, isopropanol or methanol, which are contained in products such as beer, wine, and distilled spirits or liquor.

3. "Synthetic drugs" means any substance that is not lawfully prescribed to the employee that is designed or intended to mimic or create the effect of any drug made unlawful under the Controlled Substances Act, 21 U.S.C. § 812, including but not limited to Spice, K2, or an other substances containing JWH-018, JWH-073, JWHY-200, CP-47,497, or cannabicyclohexanol.

Circumstances under Which Testing May Be Required

Preemployment Screening

All job applicants are subject to drug testing. All offers of employment with the Company are conditioned on the applicant successfully completing and passing a drug test in accordance with company testing procedures. Job applicants who refuse to submit to drug testing will be deemed to have withdrawn from the application process and will no longer be considered for employment. Job applicants who test positive after the Medical Review Officer (MRO) review will have their conditional offers withdrawn. Applicants will be given a copy of this policy and be required to read and sign the acknowledgment and consent form prior to testing.

Job Specific Testing

Employees working on federal contracts or in federally regulated positions will remain subject to federal drug testing requirements applicable to their positions. Drug and alcohol testing may be initiated per client or contract requirements. Employees selected for these assignments will be notified in advance.

Post-Incident Testing

Employees involved in a work-related accident or incident or a "near miss" may be required to submit to drug and alcohol impairment testing for the following reasons:

- Employee was involved in or contributed to an accident that resulted in an injury to the employee or another person.

- Employee was involved in or contributed to an accident that caused equipment, property, material damage, or loss.

Determinations regarding whether an employee's conduct falls within the above-described situations shall be made at the sole discretion of the Company.

Reasonable Suspicion of Impairment

Testing will be conducted when the Company has reasonable suspicion that an employee may be affected by the use of drugs or alcohol and that the use may adversely affect job performance or the work environment. Examples of reasonable suspicion may include, but are not limited to, the employee's speech, behavior, odor, or other conduct that may affect the employee's work.

Periodic / Random Testing

From time to time, the Company may require employees or groups of employees to undergo drug or alcohol testing on a random basis.

Retesting

If a drug-use test or alcohol-impairment test is considered unsuitable or inconclusive by the employer for any reason, the employee or applicant may be immediately retested. Examples of unsuitable or inconclusive test results include, but are not limited to, specimens that are considered diluted or specimens that have a low urine specific gravity. An employee or applicant may be instructed to refrain from drinking water or using diuretics (subject to medical concerns) for a specified time period prior to the retest.

Failure of an employee or applicant to follow the employer's instructions or to cooperate with the employer in providing a suitable specimen with a specific gravity equal to or greater than 1.005 may be treated by the employer as a refusal to be tested or a positive test result and may subject an employee to disciplinary actions up to and including termination. If an applicant's retest is considered unsuitable or inconclusive, the Company may refuse to hire the person.

Legally Prescribed and Over-the-Counter Medication

Use of prescription drugs prescribed by a licensed physician as medication for use by the person to whom the prescription was prescribed the medication is allowed. Such medications should not impair the employee's ability to perform assigned duties in a manner satisfactory to the Company.

Employees who take over-the-counter medication or other lawful medication that can be legally prescribed under both federal and state law should inform their immediate supervisor if they believe the medication will impair their job performance, judgement, coordination, safety, or the safety of others. Employees should discuss with their supervisor options for a reasonable accommodation and consult with Human Resources as needed.

All individuals will be provided the opportunity to list all medically prescribed drugs at the time that the individual is providing a specimen for testing. Individuals must report any legally prescribed drugs they are taking prior to providing a sample for testing. The company will recognize only those prescribed medications that are legal in the United States.

Although some states have decriminalized the use of marijuana by adults, the law does not allow employees to use recreational marijuana while at work or to be impaired at work. The Company does not recognize marijuana as a legal drug for purposes of this policy.

POLICY AGAINST WORKPLACE VIOLENCE

This policy covers all workers at the Company, including independent contractors or their employees hired or used by the Company, as well as all customer or any persons associated with the Company or on Company property. The Company has a strong commitment to its employees to provide a safe, healthy, and secure work environment. The Company also expects its employees to maintain a high level of productivity and efficiency. The presence of weapons and the occurrence of violence or intimidating or threatening behavior in the workplace during working hours or otherwise are inconsistent with these objectives.

Employees are expected to refrain from conduct that may be dangerous to others. Conduct that threatens, intimidates, or coerces another employee, customer, or vendor will not be tolerated. The Company's resources may not be used to threaten, stalk or harass anyone at the workplace or outside the workplace. Indirect or direct threats of violence, bullying, incidents of actual violence, and suspicious individuals or activities should be reported as soon as possible to your supervisor or any member of management. Employees should never make a threat, even if they are "just kidding." All threats will be considered serious and may result in employee's discharge. Employees should not place themselves in peril, and should not attempt to intercede during an incident. Contact the appropriate management or authorities as applicable.

Employees should inform the Company's President of any protective or restraining order or injunction against harassment that they have obtained that identifies the workplace as a protected area. Copies of any court orders should be provided to the Company's President.

The Company has the right to search any areas on Company premises for weapons including, but not limited to, lockers, furniture, containers, drawers, equipment or other facilities, lunch boxes, briefcases, personal bags, personal tool boxes or tool kits, parking lots, Company vehicles, and personal vehicles parked on Company premises.

If an employee is injured while participating in a fight or after instigating a fight, entitlement to Workers' Compensation benefits may be denied.

An employee who has been subjected to intimidating behavior or acts of violence, or who witnesses an act or threat of violence or intimidation towards anyone else is to take the following steps:

1. If an emergency exists and the situation is one of immediate danger, the employee should call 9-1-1 and take whatever emergency steps are available and appropriate to protect himself or herself and others from immediate harm, such as leaving the area.

2. If the situation is not one of immediate danger, the employee should report the incident to your manager and/or Human Resources as soon as possible.

Appropriate corrective action, up to and including termination of employment, will be taken against anyone found to have violated this policy. In addition to disciplinary action, individuals may be subject to arrest, criminal prosecution and/or civil litigation as a result of violation of this policy. Retaliation against any employee who reports workplace violence is prohibited.

The Company specifically prohibits the following and will routinely discipline an employee, up to and including termination, for any of the following:

1. Engaging in behavior that is intimidating or threatening, either explicitly or implicitly, either through remarks or physical intimidation.

2. Causing or attempting to cause physical injury to another person.

3. Use, possession or sale of any weapon.

4. Storing any weapon in a locker, desk, vehicles, lunch box, tool kit, bag, purse, or other repository on the worksite or other Company premises, except secured in locked vehicle in compliance with applicable law.
5. Illegal possession, use, or sale of a weapon off Company property that adversely affects the employee's own or other's safety at work, or indicates a propensity to adversely affect the employee or coworkers.

6. Refusing to submit to an inspection for the presence of a weapon.

7. Conviction under any criminal statute for the illegal possession of a weapon or for committing a violent act against the person or property of another.

8. Refusing to participate in an investigation pertaining to allegations or suspicions that violence has or is likely to occur or an investigation pertaining to the carrying of a weapon by the employee or a coworker or that threatening or intimidating behavior has occurred.

9. An employee's consent to submit to a search is required as a condition of employment and the employee's refusal to consent may result in disciplinary action, up to and including termination.

SMOKING AND VAPING POLICY

The Company prohibits smoking in all work buildings, jobsites, and work vehicles, whether owned, leased, or operated by the Company and within 20 feet in any direction from any doors, windows, and/or ventilations systems of any buildings. The Company prohibits smoking or vaping in all areas except in those locations that have been specifically designated as smoking areas, including but not limited to area at which fuel or other flammable substances are present.

POLICY REGARDING PHYSICAL EXAMINATIONS

The Company may require a job-related medical examination when there is a need to determine if an employee can perform mandatory functions of his/her position. This exam will identify physical limitations or restrictions and any significant health or safety risks to the employee or others. Further medical monitoring as required by medical standards, professional licensing bodies or standards established by Federal, state or local law may also be identified and required as a result of such examinations.

The Company may conduct voluntary medical examinations and health promotion activities. The records from these screenings will be kept confidential. The cost of the voluntary or medical examinations rests with the Company. The employee is not responsible for accruing any of the costs for these procedures.

A doctor's note may be required for employees who are absent as a result of injury, illness or disability.

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SECTION II

WRITTEN SAFETY PROGRAMS

COMPANY SAFETY STATEMENT

All employees are required to comply with the Company's safety policies, practices and procedures and should be familiar with the Company's written safety plans and other written safety materials. Any violations of safety policies, practices or procedures can lead to discipline, up to and including termination.

Any accident or injury on the job must be reported to your supervisor and the Company's President immediately in order to ensure that the proper medical attention is received and forms may be filled out and processed.

The Company regularly communicates with employees in different ways about jobsite safety and health issues. These communications may include but are not limited to, supervisor-employee meetings, bulletin board postings, memos, or other written communications.

Employees and supervisors receive safety training. The training addresses possible safety and health hazards, as well as identifying safe work practices and procedures to eliminate or reduce hazards. Some of the best safety improvement ideas come from employees. If you have an idea, concern, or suggestion on how to improve safety at the jobsite, tell your supervisor or the Company's President. Please report any concerns about workplace safety.

EMPLOYEE RESPONSIBILITIES

Safety is everybody's responsibility. The cooperation of every employee is necessary to make this Company a safe place in which to work. Help yourself and others by reporting unsafe conditions or hazards immediately to your supervisor or to the designated point of contact for a particular jobsite.

Employees are required to become familiar with and comply with the Company's policies, practices, and procedures. Employees are required to abide by Company and OSHA safety rules and procedures and are subject to discipline, up to and including termination, for violating safety rules. Employees are required to immediately report any unsafe condition or action to a supervisor or the Company's President.

No matter how safe your working area may be, carelessness or "horseplay" on your part can make you or your coworker a casualty. You should use common sense and know and follow all safety and fire regulations, which will protect you and your fellow employees from inconvenience or serious injury. Employees are responsible for following all safety rules and for using safety equipment furnished by the Company. Your suggestions for safety, as well as suggestions for the improvement of any other phase of our operation, are encouraged at all times.

The Company's goal is to achieve and maintain safe working conditions. We expect and appreciate your cooperation in helping us to achieve this goal.

OVERVIEW OF SAFETY PROGRAMS

Safety is a priority for the Company. Safety programs are to be implemented at each jobsite and shall conform to the specific needs and requirements of a particular job to achieve incident

prevention, create visible awareness of the importance of safety, and conform to all applicable federal and state safety regulations.

Minimum requirements for Safety Programs are as follows:

1. Regular meetings are to be held to discuss procedures, relevant issues, and events as they relate to safety.

2. Procedures for accident reporting and investigation are to be defined.

3. Periodic inspections and compliance audits are to be performed at jobsites for verification that required procedures are implemented, understood, and followed.

4. An organized training program for new and existing employees must be in place.

5. Specify what personal protective equipment and clothing will be provided for its employees consistent with applicable laws and regulations.

6. Safe operation of any vehicle in the performance of Company business in compliance with all applicable laws. While on Company business, employees must wear seat belts while operating or occupying any vehicle and ensure all passengers of any vehicles they are operating wear seat belts as well.

INCIDENT PREVENTION SAFETY PROGRAM

Scope

It is the policy of the Company to maintain a safe and healthful workplace. To implement that policy, the Company has developed an Incident Prevention Written Safety Program that has been outlined on the following pages.

The Incident Prevention Written Safety Program encourages communication between management and employees regarding safety matters. The program provides various methods for management to keep employees informed about conditions important to their health and safety and for employees to communicate their safety concerns. It also defines the roles of both management and employees in maintaining a safe workplace.

Members of management, including immediate foremen are responsible for assuring a safe environment that is in compliance with federal, state, and local safety regulations.

Employees are expected to obey safety rules, follow established safe work practices and exercise caution in all work activities. All employees are expected to immediately report any unsafe conditions to their foreman. Employees at all levels of the organization are responsible for seeing that unsafe conditions are corrected for their health and safety and also for others working with them. Working together, all employees can enjoy a safe and healthful workplace.

Roles and Responsibilities

The Company's foremen and supervisors are responsible for implementing the Incident Prevention Written Safety Program, including but not limited to the following:

1. Participate in periodic scheduled inspections.

2. Participate in investigation and analysis of incidents involving serious injuries or illness; record and take action in the prevention of similar future incidents.

3. Insure that potential safety or health hazards of all new processes, methods, or materials introduced into the workplace have been reviewed prior to implementation or use.

4. Serve as a conduit for communication between employees and management, investigating any allegations of hazardous conditions brought to management's attention.

Safety Rules

Certain basic principles of safety are so important that they can only be expressed as "rules." These safety rules are a basic part of our Incident Prevention Program and are also part of our disciplinary procedures. All employees need to know and follow these Safety Rules; all foremen and management personnel must enforce them.

The Company's basic Safety rules include:

1. All injuries must be reported to your foreman immediately.

2. Immediately report unsafe or unhealthful conditions in the workplace, including defective tools or other equipment, to your foreman.

3. Established, safe job procedures must be followed by all employees.

4. Changes in regular job procedures require the approval of your immediate foreman.

5. If unsure how to operate a machine or perform any assigned task, ask your foreman before proceeding.

6. Do not remove guards from machines and leave them off.

7. Personal protective equipment (PPE) must be worn or used in any area where it is required.

8. Use only the proper tool for the job. Do not use defective tools or equipment. If the proper tool is not available, get help from your foreman before doing the job.

9. Get help in lifting any item which is so bulky, awkward or heavy that you feel you cannot lift it safely.

10. If a task poses a safety or health hazard, report it to your foreman immediately.

11. Alcohol and other drugs are prohibited in the workplace.

Identifying and Evaluating Workplace Hazards

To maintain a safe and healthful workplace we need to have a way to identify hazards that might be present. Recognizing that unsafe work practices of people generally cause more incidents than unsafe conditions (by themselves), we intend to focus on both the unsafe work practices as well as unsafe physical conditions.

Inspection of the workplace is the primary tool to identify unsafe conditions and practices. An inspection should answer the following questions:

1. Are the Company's safety rules being followed?

2. Does machinery and other equipment have the necessary guards in place?

3. Are chemicals being safely used and stored, including flammables? Are the Material Safety Data Sheets (MSDS) accessible?

4. Are good housekeeping practices being maintained at worksites?

5. Is personal protective equipment being used where required and being used properly?

6. Are machinery, hand tools or other equipment in damaged condition taken out of service immediately, and being replaced?

7. In general, are industry-accepted safe practices being followed (such as not using electric power tools when standing in water)?

It is our company policy to complete all required workplace inspections and to keep records of these inspections. It is not enough to meet the "letter of the law." Inspection of our workplace is simply a good business practice. It is one way of knowing that our plan is working.

Some of the benefits we can derive from effective safety inspections are:

1. Detection and elimination of physical hazards

2. Detection and elimination of unsafe work practices

3. Control of housekeeping

4. Stimulation and maintenance of employee interest in safety

5. Education of employees at all levels

6. Compliance with federal and state safety and health laws

7. Increased knowledge of operations

8. Improved utilization of space.

It is everyone's responsibility to continuously search out and correct recognized safety and health hazards and work practices. Regular and periodic inspections by management, foremen, safety committees and employee teams are the principal means of locating hazards before incidents and injuries occur. Since incidents and injuries are caused primarily by unsafe physical conditions and/or unsafe practices, inspections should involve a search for both.

Employee Responsibilities

All employees are responsible for inspecting their own workplace conditions to their immediate foreman unless they are able to safely correct the situation themselves.

Foreman Responsibilities

All foremen are responsible for routinely inspecting their area of responsibility and where possible correcting unsafe conditions and work practices. If corrections cannot be done at the foreman's level, they are responsible for assuring that corrections are completed by appropriate individuals.

A more in-depth analysis of hazards or potential hazards is required of the foreman when a task is known to have caused incidents in the past, or when the foreman is investigating the cause of a recent incident. In both cases the foreman must focus on the specific hazard(s) or actions that caused or contributed to the incident.

Tasks That Have Involved Incidents

A Job Hazard Analysis (see below) should be completed on every task or operation that has caused incidents in the foreman's area of responsibility. This should be documented in a Job Hazard Analysis format and a copy filed with the Supervisor.

Investigation of Incidents

If an incident occurs in a foreman's area of responsibility, the "Foreman's Investigation Report" is to be completed within forty-eight hours or as soon as practical. The report is filed with the supervisor.

Supervisor Responsibilities

The supervisor is responsible for overall management of the organization's safety. This is accomplished through:

1. The use of periodic comprehensive, standardized inspection reports of the

workplace.

2. Regular and frequent reviews of the OSHA 300 Log and review and discussion of the "Foreman's Investigation Reports." Review of incidents can often identify certain areas of our workplace that have potential hazards or specific job tasks that involve an unsafe practice.

Job Hazard Analysis (JHA) Form

Often it is not obvious what corrective action we should take for a hazardous condition or unsafe job practice. Sometimes there will be several possible solutions. Use of the Job Hazard Analysis (JHA) form can help determine which the most appropriate action is.

What is a JHA?

One way to increase knowledge of hazards in the workplace is to conduct a job hazard analysis on individual tasks. A JHA is a procedure which helps integrate accepted safety and health principles and practices into a particular operation. In a JHA, each basic step of the job is examined to identify potential hazards and to determine the safest way to do the job.

The first step is to observe a worker actually performing the job. For infrequently performed or new jobs, observation may not be practical. With these, one approach is to have a group of experienced employees and foremen complete the analysis through discussion. An advantage of this method is that more people are involved allowing for a wider base of experience and promoting a more ready acceptance of the resulting work procedure. The benefits from developing a JHA will become clear in the preparation stage. The analysis process may identify previously undetected hazards and increase the job knowledge of those participating. Safety and health awareness is raised, communication between workers and foremen is improved, and acceptance of safe work procedures is promoted.

The completed JHA, or better still, a written work procedure based on it, can form the basis for regular contact between foremen and workers on health and safety. It can serve as a teaching aid for initial job training and as a briefing guide for infrequent jobs. It may be used as a standard for health and safety inspections or observations and it will assist in completing comprehensive incident investigations.

The four basic steps:

The four basic steps in conducting a JHA are:

1. Selecting the job to be analyzed
2. Breaking the job down into a sequence of steps
3. Identifying potential hazards
4. Determining preventive measures to overcome these hazards.

Correcting Unsafe Conditions and Unsafe Work Practices

To maintain a safe and healthful workplace requires correcting identified potentially hazardous workplace conditions. Knowing about and failing to correct potentially hazardous situations is against company policy. It is the responsibility of all employees and foremen to contribute toward making our workplace as safe as possible.

Although it is our intention to eliminate all unsafe conditions and work practices as quickly as possible, some corrective actions require longer periods of time and/or larger expenditures of capital. Because of this, it is necessary to evaluate the severity of the hazards and focus our attention on those that have the highest potential to cause serious injury or illness.

One way to evaluate hazards is to examine our incident records, including the OSHA 300 Log which records time lost from work. Injuries or situations that reoccur frequently suggest that measures should be taken quickly to take corrective measures.

Once it has been determined that an unsafe condition or work practice exists, and the seriousness of the hazard has been evaluated, a corrective action plan will be developed and executed.

All Employees

All company personnel have a responsibility for helping make sure we all have a safe and healthful place to work. Employees should make recommendations for changes in the workplace or in work practices that will improve job safety and performance. Employees may make these changes when these changes are within their level of authority and expertise and the change does not adversely affect operations or personnel.

Foremen and Supervisors

Foremen and supervisors are responsible for making changes in operations and work practices that improve the job safety and performance of the people in their areas of responsibility. When changes are not within their budget authority or expertise, they must be able to justify to management why these changes are important to the improvement of workplace safety.

Management

Management has overall responsibility to assure efficient and safe operations within the organization. It is management's responsibility to make the means available to correct identified potential hazards in the workplace and to ensure that all employees have the proper training, tools and equipment to work safely and responsibly.

Corrective Action

Corrective action generally falls into four categories:

1. Engineering or mechanical controls or job redesign. This is the preferred method since it usually eliminates or reduces the hazard and is a permanent solution. ADOSH requires the use of this solution whenever possible.

2. Training. Once a safe job procedure has been established, employees will be trained in the proper and safe method to do the job. While training is always desirable, this solution requires constant supervision to make sure employees continue to do the job in the manner in which they have been trained. Refresher training should be an integral part of the training program.

3. Administrative controls can limit the amount of time an employee is exposed to a repetitive operation or exposed to a noisy environment. This type of control involves rotating employees between jobs and is difficult to administer, such as the need to cross train participants.

4. Personal Protective Equipment – such as hearing protection for noisy areas, proper gloves for material handling or exposure to chemicals, etc. is the final method for protecting employees from potential work hazards. Once again, this solution requires constant supervision to make sure the equipment is used and used properly. If engineering controls are possible, ADOSH approves the use of personal protective equipment until such time as the permanent controls can be implemented.

To ensure safe job procedures, the Company will first consider engineering controls or job re-design whenever possible. Good business practices require we have a plan for corrective action and that we document what corrective action we have taken. We have several procedures we use to do this:

1. Program Schedule Corrective Action. When corrective action for an unsafe condition or work practice involves multiple steps or cannot be completed immediately, the Supervisor should develop a plan of action. It should include by name or title of who is responsible for the changes and the estimated date of completion.

2. Incident Corrective Action Under Foreman Control. Our policy requires that foremen complete a "Foreman's Investigation Report"(see attachment) whenever an incident occurs. When corrective action is under the foreman's control, the foreman will indicate on the form what is being done and the approximate date the condition will be corrected.

3. Safety Inspection Corrective Action. When the scheduled safety inspection discloses an unsafe condition or job practice, the corrective action will be noted and reported to the Supervisor.

Training

Training is an important and ongoing part of our communication system. Certain training is required by law, such as training about hazardous materials used in the workplace.

We provide several different types of safety training to our employees:

1. A general safety orientation for all new employees.

2. Specific training on how to do their assigned job.

3. Special training for employees who work with hazardous materials or certain types of machinery or other equipment.

4. Training on the use of any personal protective equipment provided, such as respirators.

These training requirements are based upon the assumption that when employees know how to do their job properly and know the hazards of the job, they will work more safely.

Safety Orientation

Foremen, with assistance from the Company's President if desired, will provide new employees under their jurisdiction with a general orientation to the Company's Safety Policy and Safety Rules along with safety instructions specific to their assigned jobs and any personal protective equipment they may be issued. This training is to be documented on the Employee Safety Orientation attendance record. The Employee Safety Orientation attendance record is to be signed by the employees and retained in their files.

Safety Training

It is our policy to provide training in safe work practices for all of our employees. No employee shall be allowed to do a job unless they know how to do it safely and understand the hazards involved.

Safety education and training for employees shall commence at the time of employment. Before an employee actually begins an assigned task, they shall complete a short training course to familiarize themselves with company safety policies. This portion of the training course will include:

1. An explanation of the company's Safety Policy.

2. Familiarization with the general safety rules of the Company and enforcement of policies.

3. The requirement for immediately reporting all injuries along with information on how to receive available medical treatment.

4. The importance of reporting all unsafe conditions to their foreman.

5. Information concerning required additional or job-specific safety training.

6. A clear statement that no employee should attempt to do a job that appears to be unsafe or beyond their ability or training.

After an employee is assigned to a job and has received initial safety training, the responsibility for safety education and training passes to the immediate foreman. The foreman shall maintain employee safety training by discussing the company safety rules. This shall be followed by instruction on the hazards associated with the worker's specific job. Personal protective equipment should be issued and instructions given for its use. A follow-up review should be conducted within a week or two after the job assignment. This will assure that the new employee fully understands the information given at the time of employment. Foremen are responsible for every employee's safety orientation and all job related training.

Specific Job Training

When a job hazard analysis (JHA) has been completed, it will supplement employee training. The foreman will cover the steps of the job, the hazards that may be associated with each step and the correct job procedure. This specific job training is to be documented on the Employee Safety Orientation attendance record.

There are six areas that must be considered before starting a job. If there are problems in any of these areas, training may be needed.

1. Technical Knowledge – Does the person know and understand all the details of how to do the job?

2. Understand the Hazards – Does the person understand the potential hazards of the job and how doing the job incorrectly may hurt them or a coworker or damage equipment or property?

3. Specific Required Skills – Does the person have the actual ability to do the job correctly and safely?

4. Mental Capability – Even though the person knows how to do the job, the situation may change. Do they recognize how fatigue or a change in job complexity may create a potential hazard?

5. Emotional Stress – All jobs put some level of stress on the person doing the job. Does the person doing the job recognize this stress, how a change in the job and off-the-job stress may create a potentially hazardous situation?

6. People Skills – People skills are required in almost all job situations. Does the person doing the job understand the importance of their ability to work with other people? Does he or she recognize how their inability to use people skills may create potential hazards?

Adequate time must be allocated for quality training at all levels. Trainers should take time to prepare and present the programs. Participants must be given adequate time to learn the material presented. It is recognized that some people may take longer to learn new material than others and this needs to be taken into account.

Measures of Effective Training

1. Reduction in injuries
2. Reduction in damage to property and supplies
3. Reduction in retraining time
4. Increase in asking for help when it is needed
5. Increase in production
6. Increase in morale
7. Decrease in absenteeism
8. Increase in profits
9. Regulatory compliance

Communication

It is the Company's policy that there shall be open two-way communication between management and employees. No procedures or work practices shall impede the communication process.

The Company is organized to enhance this communication process. The Company's Incident Prevention Written Safety Program is designed to allow and encourage employees to communicate with various levels of management on safety and health matters and also to provide the necessary mechanism for management to keep employees informed regarding matters important to their health and safety. All pertinent preventative safety information shall be forwarded to all involved employees.

All employees are encouraged to inform their foreman of any concern they have about the potential hazards of their workplace. In addition, employees may also inform the Supervisor or management about such concerns.

There are many methods management can use to inform employees of safety matters. Whatever method is used, management is responsible to ensure that employees understand the nature of the safety issue, the action taken by management and the changes required of the employee.

The Company's policy is the foundation of the Incident Prevention Program and must be clearly communicated to all employees from the first day of employment. In order to convey the importance of this policy, it is restated:

1. It is the Company's policy to provide a safe and healthful workplace. To that end, the Company has implemented this Incident Prevention Program.

2. Members of management are expected to do everything within their control to assure a safe environment and to always be in compliance with Federal, State and local safety regulations.

3. Employees are expected to obey safety rules, follow established safe work practices and exercise caution in all of their work activities.

4. All employees are expected to immediately report any unsafe conditions to their foreman. Employees at all levels of the Company who are responsible for correcting unsafe conditions should do so.

5. Working together, we can succeed in having a safe, healthful and profitable workplace from which we all will benefit.

Safety Rules

Safety rules go hand in hand with company policy. If safety rules are understood and adhered to, we will have a safer place to work and fewer incidents. Safety rules are also the basis for the disciplinary program as it applies to repeated violation of safe work practices. Like company policy, they must be clearly communicated to each employee from the first day of employment.

Communicating Policy and Safety Rules

All employees are to be given a copy of the Company's safety policy and safety rules during the first orientation. These rules are to be reviewed with the employee and the employee must indicate whether he or she understands them. This is to be documented on the Employee Safety Orientation attendance record. This record is kept in the employee's personnel file.

Safety Posters

Although safety posters can bring attention to an immediate hazard or serve as a general reminder, posters are one of the least effective methods of communication and shall only be used as reminders or to identify a specific job hazard.

Incident Reports

The Company investigates work-related incidents and near-miss incidents involving persons or property related to any portion of our business. OSHA requires that the Company maintain a Log of Occupational Injuries and Illness. OSHA Form 300 is used to record these workplace injuries and illnesses that meet the requirements of the law.

It is the foreman and/or supervisor's responsibility to make sure this report is completed and sent to the insurance carrier within forty-eight hours of the time notice of an injury or illness

is received. The foreman/supervisor is to maintain a file of all incident and illness reports for the company.

Properly used, incident records are one of the most powerful tools we have to improve our safety program. Acceptance of responsibilities and focus is the difference between an effective safety program and one that is largely a waste of time and money. An effective safety program gives management the ability to quickly identify the problem so that we can manage the results. We can control incident frequency by focusing on the most common type of incidents. We can control incident costs by focusing on serious or costly incidents.

Incident Reports are the starting point. The goal is to separate all incidents by type and cause of incident. Sometimes this can be done by a simple review of incident records; other times some incident investigation may be necessary. Once we identify the most common type of incident and those that typically are the most costly, we can often trace these incidents directly to specific areas. After that, it becomes a much easier job to develop and set up corrective action, such as training. Keeping incident records, investigating incidents, and analyzing the results are simple but powerful tools in our Incident Prevention Program.

Incident Reporting

The Company's employees and agents of any subcontractor of the Company are required to report any of the following circumstances:

1. Any incident resulting in injury or illness of any magnitude, which occurred during Drake Industries' performance of its work on a project, or while working on Company time.

2. Any accident or incident resulting in property or equipment damage of any magnitude (which might have affected the proper and safe operation of such equipment) that occurred during Drake Industries' performance of its work on a project, or while working on Company time; and

3. Any "Near Miss" incident that could have potentially resulted in a serious injury or illness to a worker.

Incident Investigation

A Company supervisor or foreman is responsible to see that all accidents are investigated and properly reported. Immediately upon notification of an incident, the following procedure should be used while investigating:

1. Survey and secure the location. DO NOT put yourself in danger.

2. Call 911 and render aid to the injured, if necessary.

3. Send someone to the entrance to direct emergency vehicles to the accident site.

4. Secure the incident area (Barricade area – stop all work activities in area which incident occurred).

5. Notify your safety representative immediately for all incidents (other than routine first aid).

6. Contact the President and other necessary jobsite personnel and notify them of the incident.

7. Take all necessary photographs of the scene in its immediate state.

8. Take all statements from any eyewitnesses to the incident.

INCLEMENT WEATHER SAFETY PROGRAM

Inclement weather can strike at any moment and comes in many forms (tornadoes, hurricanes, sandstorms, windstorms, flooding, freezing, blizzards, etc.). All projects must be prepared if bad weather strikes their area.

The following is a guideline in which to follow should inclement weather threaten:

1. Follow the directions of all public service announcements and any direction given by local authorities. Begin preparing as soon as an announcement is made.

2. Contact the Company's President and notify them of your situation and any additional support needed.

3. Secure the site. Tie down any loose objects that might be blown or create a hazard. Make sure trailers, hydro-mulch trucks, and other machinery are secured.

4. Contact general contractor and/or subcontractors and notify them of the approaching inclement weather. Have them notify their workers and secure any materials and trailers they have on site.

5. Back up all computer data and store backup data in a safe place.

6. Turn off all gas, water and electricity to job trailer and construction area/s as needed.

For freezing weather conditions:

1. Add temporary heating equipment, as necessary.

2. Shutdown any irrigation systems as needed.

3. Close and lock all doors and gates.

4. Shutdown and ensure storage of hazardous materials is in safe condition.

5. Evacuate the project and get out of harm's way.

If time does not allow for site preparation, protect yourself and find shelter. Do not stay in trailers or vehicles during tornadoes or high wind situations. Find a secure area free of windows or areas where objects could strike you.

FIRE PROTECTION AND PREVENTION SAFETY PLAN

Fire Emergency

Any uncontrolled fire constitutes a fire emergency. These are fires that endanger the Company's employees or fires that cannot be contained and extinguished with onsite equipment.

In the event of a fire emergency, Company personnel shall evacuate the area affected by any fire, smoke, or other effect of a fire and meet at the designated evacuation area of the project. At jobsites, the foreman and/or supervisor is responsible for accounting for all personnel and a designated reporting location should be selected at the start of the job.

Actions You Should Take During a Fire Emergency

Do not attempt to put the fire out, unless it is containable. Only those employees trained in the use of fire extinguishers may attempt to extinguish a fire. Extinguishers must be distributed in such a way that the amount of time needed to travel to their location and back to the fire does not allow the fire to get out of control. Fire extinguisher locations in the main facility are clearly marked. Each Company field vehicle is equipped with a fire extinguisher that should be kept charged, inspected and readily available.

Proper Applications of Various Types of Fire Extinguishers

All fires are not the same. There are different extinguishers for different kinds of fires.

1. Class A: (triangle) (water): paper, cloth, wood, rubber, some plastics
2. Class B: (square) (dry chemical): oils, gasoline, grease, some paints, flammable liquid
3. Class C: (circle) (CO2): wiring, fuse boxes, electrical equipment
4. Class D: (star): combustible metals such as magnesium or sodium
5. Class ABC (multipurpose dry chemical): any combination of ABC applications

Operation of Fire Extinguishers

Remember the word "**PASS**"

P-	PULL	Pull pin: Some units require releasing a lock latch pin or the pressing of a puncture lever
A-	AIM	Aim at the base of the fire
S-	SQUEEZE	Squeeze or press the handle to start flow of fire retardant

S- SWEEP Sweep slowly base of fire until it goes out

Size/Capacity of Fire Extinguishers

The smallest fire extinguisher may not have the capacity to extinguish fires experienced. Large capacity extinguishers may be needed in fuel (gasoline) or lumber type fires.

Fire Prevention Plan

The Company's Fire Prevention Plan is designed to reduce the danger of fire. The following is a list of the major potential workplace fire hazards and the procedures to be used to reduce the risk of fire.

Common Fire Hazards at the Worksite

1. Overloaded fuses, circuits, motors, outlets
2. Wiring with frayed or worn insulation
3. Loose ground connections
4. Improperly stored flammable and combustible liquids
5. Oily rags
6. Uncontrolled ignition sources
7. Poor housekeeping/ trash accumulation

Smoking

Careless smoking is a major cause of fire. To minimize this potential fire source, smoking is allowed only in designated areas. The Company will designate an appropriate smoking area at each worksite. At jobsites, diligence is required to be sure cigarettes/cigars are extinguished and deposited in metal containers.

Trash Accumulation

The accumulation of trash generated in the course of the workday provides an environment conducive to the spread of fire. In order to reduce this potential risk, the following steps are to be taken by all supervisors:

1. Any area that accumulates trash and compromises the cleanliness and sanitation of the worksite shall be taken care of immediately to preclude fuel for fires.
2. All worksite areas should be cleaned up when housekeeping falls below Company standards and at the end of the shift.

Improper Storage of Flammable and Combustible Materials

Improper storage of materials can contribute to the ignition and spread of fire. To reduce this risk, follow the Fire Protection and Prevention Program and use the following procedures:

1. Gasoline and other flammable liquids must be stored in approved industrial quality containers that are properly labeled. These materials are not to be stored in glass or plastic containers. If flammable liquids are removed from their original container, they are to be stored in an approved safety can that is properly labeled to meet the requirements under the Hazard Communication Standard. An approved safety container has a spring-loaded valve and an anti-flash screen.

2. Do not store flammable or combustible materials near a heat source or other possible ignition source. If in doubt of storage requirements, consult the label, the appropriate material safety data sheet, or the supervisor/foreman.

3. Flammable or combustible materials not in use should be stored in a clearly labeled, approved fire-resistant cabinet that is kept closed unless materials are being added or removed.

Fire Protection Procedures

The foreman or supervisor assigned to each project must ensure that each employee also assigned to the project follows these general procedures for placing, maintaining, inspecting, and using fire extinguishers:

1. Each employee is aware of the Site-Specific Emergency Procedures and proper use of fire extinguishers at a safety/coordination and/or with safety toolbox meetings.

2. Locate all fire-fighting equipment in clear view where it can be easily reached.

3. Inspect all fire-fighting equipment periodically and replace defective equipment.

4. Check portable fire extinguishers periodically to ensure that they are available for use and properly charged.

5. Arrange for a licensed fire extinguisher service company to inspect all portable fire extinguishers annually. These inspections should be documented in writing using the following procedure:

6. Tagging Extinguishers. Tie tags to fire extinguishers. The tags should include the date the last inspection (annual and monthly) was performed.

7. Instruct employees not to remove or tamper with fire-fighting equipment and to report missing or inoperable/damaged equipment to the foreman or supervisor.

8. No welding/cutting, etc. will be performed on or around any fuel tanks or combustible materials.

9. If storing fuel on the project, provide a fire extinguisher with a minimum rating of 20:BC in a prominent location not less than 25 feet or more than 75 feet away from the storage area.

10. Ensure each Drake Industries' vehicle and machinery is equipped with a fire extinguisher that has been inspected and approved.

Fire Reporting Procedures

Brief all employees on the proper procedures to follow in case of fire. In all cases of fire, employees should immediately contact the fire department and notify the supervisor or foreman, and/or a representative of other contractors that are present on the project site.

1. 911 and Local Emergency numbers should be made readily available to each employee.

2. Employees should notify other employees of emergencies by the following methods:

    a. Use two-way voice communications (radios/telephones) carried by employees and other contractors.

    b. Meet at the pre-designated assembly point to get a headcount.

Fire Lanes

Each employee should work to ensure that all access points to Drake Industries' work area on the project are clear of materials, vehicles, debris, trash or any hazard that might create or hinder a means of entry or exit on the jobsite. Combustible storage areas must have at least a 15' clear access between each pile to allow for the access of firefighting equipment.

General Safety Practices Regarding Fire Protection

1. Emergency numbers must be posted in a conspicuous location.

2. The workplace should be frequently inspected to ensure that fire hazards are identified and eliminated.

3. Smoke in approved areas only. Obey all "NO SMOKING" areas.

4. Any task that is capable of producing sparks or using and open flame will require that a "Hot Work Permit" (SF 3.20) be completed, presented, reviewed and approved by the project supervisor PRIOR to commencing of the hazardous task.

5. Be familiar with emergency procedures.

6. Remove trash and debris from the work area daily.

7. Properly dispose of oily, greasy or paint/thinner soaked rags and towels.

8. Keep solvents and other flammable/combustible materials in approved properly labeled metal safety cans, stored in proper locations.

9. Keep sparks flames, and excessive heat away from solvents and other combustible material.

10. Do not use flammables such as gasoline for cleaning purposes.

11. Keep firefighting equipment, fire exits and egress paths clear and ready for immediate use.

12. Maintain metallic contact (electrostatic bonding) between the two containers when pouring gasoline or transferring other flammable materials from one container to another.

13. Shut off engines of vehicles and other equipment when refueling.

14. Report all fire hazards to a supervisor immediately.

15. All jobsite fuel tanks must be properly labeled (i.e. - DIESEL, NO SMOKING, FLAMMABLE) and must have a fire extinguisher within 75 feet of tank(s) at all times. A containment area must be built up around tank(s). They must be located at least 20' from buildings or structures.

16. All fuel tanks must be equipped with an approved dispensing device (pump) and approved automatic self-closing dispensing valve.

Flammable Liquids

1. Only approved containers and portable tanks should be used for storage and handling of flammable and combustible liquids.

2. No more than 25 gallons of flammable or combustible liquids should be stored in a room or in areas outside of an approved storage cabinet.

3. Flammable liquids must be kept in approved closed containers at all times when not in use.

4. Never attempt to pour flammable liquids from a large container such as a 55-gallon drum into a smaller container.

5. Nozzles for transfer of flammable liquids from large containers must be approved and be self-closing or automatic shut off type. Only approved manual stroke pumps where the liquid is drawn through the top of the container may be used.

6. Containers of flammable liquids must be electrically grounded and interconnected (bonded) during transfer of liquids from one container to another, to reduce the likelihood of sparks being generated by a buildup of static electricity.

7. Flammable liquids must not be stored or used in areas where they are exposed to sources of heat, spark, or flame.

8. The use of flammable liquids must be restricted to well ventilate areas.

9. Store only the quantities of flammable liquids necessary for one work shift of operation in any work area.

10. Rags and waste items or materials used in conjunction with flammable liquids must be placed in closed containers until discarded.

This plan provides the minimum guidelines for project fire protection. It explains Drake Industries' responsibilities for fire protection and making employees aware of the locations of fire extinguishers so that employees can participate in fire prevention, and are prepared to use extinguishers if necessary.

HAZARD COMMUNICATION PROGRAM (HAZCOM)

Hazcom (Hazardous Substance Communication) and SDS Program

The Company has instituted a Hazardous Substances Communication Program to assist in protecting the health and safety of our employees. It is the Company's intention to communicate hazardous substance information whenever Company operations might expose employees to hazardous substances as a result of normal work conditions or as the result of a reasonably foreseeable emergency. Containers of substances should be marked as described below.

Scope

This program applies to all employees of the Company that work on any project site where one may be exposed to hazardous substances under normal working conditions or during a reasonably foreseeable emergency.

The Standard requires all substances to be evaluated to determine if they are hazardous. To meet this requirement, the Company relies on the evaluation that the manufacturer or supplier is required to make. The results of these evaluations are provided on safety data sheets (SDS).

Under this program, employees will be informed of the contents of the Hazard Communication Standard, the hazardous properties of substances and chemicals in their workplace, safe handling procedures, and measures to take for protection from the hazards of those substances and chemicals. Employees will also be informed of the hazards associated with non-routine tasks and unlabeled pipes in their workplace.

Identification Of Hazardous Substances Used in The Workplace

"Hazardous Substances " are materials or mixtures listed by State or Federal OSHA as Hazardous Substances.

"Exposure" is any situation arising from work conditions where an Team Member MAY ingest, inhale, absorb or otherwise come in contact with a hazardous substance.

Each supervisor and/or designated safety personnel should be able to access a list of all hazardous substances to which Team Members may be exposed at a jobsite, using the same chemical name referenced on the appropriate Safety Data Sheets ("SDS") for those substances.

Safety Data Sheets

SDS sheets are documents that supply information about a particular hazardous substance or mixture. Manufacturers are required to provide SDS sheets when the hazardous substances are sold to distributors or purchasers.

An SDS should be available, upon request, to any employee or an employee's designated representative, physician, or OSHA.

The supervisor and/or designated safety personnel should be alert to others (such as other contractors) whose work on the jobsite may expose employees to additional hazardous substances. When it appears such exposure will occur, the supervisor and/or designated safety personnel should obtain the SDS sheet for the substances used by other contractors.

Safety Data Sheets may be accessed by contacting the Company's supervisors or President, and for any hazardous substances used at a jobsite, the product's SDS sheet should be maintained at the project site.

Labels

When hazardous substances are received, the supervisor and/or designated safety personnel should verify that the containers have been examined to determine if the labels provide the following information:

1. The identity of the hazardous substances within the container;

2. The name, address, and telephone number of the chemical manufacturer, importer, or other responsible party;

3. Appropriate hazard statements, i.e., warnings regarding the physical and health hazards associated with those substances, such as an explanation of the type and severity of the hazard;

4. Cautionary words such as "Danger" or "Warning";

5. Precautionary statements describing recommended measures to minimize or prevent adverse effects from exposure;

6. Pictograph symbols identifying the hazard.

When hazardous substances are transferred into portable containers, the portable containers must be labeled with the following information:

1. The identity of the hazardous substances within the container;

2. The name, address, and telephone number of the chemical manufacturer, importer, or other responsible party;

3. Appropriate hazard statements, i.e., warnings regarding the physical and health hazards associated with those substances, such as an explanation of the type and severity of the hazard;

4. Cautionary words such as “Danger” or “Warning”;

5. Precautionary statements describing recommended measures to minimize or prevent adverse effects from exposure;

6. Pictograph symbols identifying the hazard.

Portable containers may be labeled with an extra copy of the manufacturer's label or with a printed label which indicates the above information.

EXCEPTION: When a Team Member transfers a hazardous substance into a portable container for the Team Members own immediate use, the portable container need not be labeled.

Each supervisor and/or designated safety personnel should ensure that the labels on containers of hazardous substances are not removed or defaced, unless the containers are immediately relabeled with the following information:

1. The identity of the hazardous substances within the container;

2. The name, address, and telephone number of the chemical manufacturer, importer, or other responsible party;

3. Appropriate hazard statements, i.e., warnings regarding the physical and health hazards associated with those substances, such as an explanation of the type and severity of the hazard;

4. Cautionary words such as “Danger” or “Warning”;

5. Precautionary statements describing recommended measures to minimize or prevent adverse effects from exposure;

6. Pictograph symbols identifying the hazard.

7. Containers without complete labels or with defaced labels must not be used on the job.

Information and Training

At the time of hire and when employes are exposed, or could be exposed, to hazardous substances in their work area, the Company will provide appropriate information and training.

Training should be provided before employees are assigned duties that may result in exposure to hazardous substances. Training should also be provided when new hazardous substances are introduced into the work area or when an SDS is changed. Training should be documented and provide at least the following:

1. Location of the written Hazard Communication Program, SDS, and Chemical Inventory List;

2. How to access SDSs and related information;

3. How to read the labels and SDS for pertinent information;

4. Methods and observations that may be used to detect the presence of or release of hazardous chemicals by use of monitoring devices, visual appearance, or odor, as applicable;

5. Information on which hazardous substances are in the work area and how to read and interpret information on SDS and labels;

6. Any physical or health hazards associated with the use of a hazardous substance or mixture being used in the work area;

7. Proper precautions for handling, including specific procedures the Company has implemented to protect workers from exposure such as personal protective equipment and work practices;

8. The methods and observations that can be used to detect the presence of a hazardous substance in the work place (e.g., odor, visual appearance and monitoring);

9. The ability of employees, their physicians, or their agents to receive information on hazardous substances to which they may be exposed. Employees have a right to this information and will not be subject to retaliation based on exercising rights to review and obtain this data; and

10. Emergency procedures for spills, fires, disposal and first aid.

The Company shall maintain records of the HazCom training.

Commonly Found Hazardous Substances

1. Acetone
2. Acetylene gas
3. Adhesives
4. Aluminum etching agent
5. Ammonia
6. Anti-freeze
7. Arsenic compounds
8. Asbestos
9. Asphalt (Petroleum) fumes
10. Benzene (and derivatives)
11. Bleaching agents
12. Carbon black
13. Carbon monoxide (in cylinders)
14. Caulking, sealant agents
15. Caustic soda (sodium hydroxide)
16. Chromate salts
17. Lime (calcium oxide)
18. Chromium
19. Cleaners
20. Cleaning agents
21. Coal tar pitch
22. Coatings
23. Cobalt
24. Concrete curing compounds
25. Cutting oil (oil mist)
26. Creosol
27. De-emulsifier for oil
28. Diesel gas, diesel oil
29. Drywall
30. Dusts (brick, cement block)
31. Enamel
32. Etching agents
33. Ethyl alcohol
34. Limestone
35. Fiberglass, mineral wool
36. Foam insulation
37. Freon 20, R20 (and others)
38. Gasoline (petrol, ethyl)
39. Glues
40. Graphite
41. Greases
42. Helium (in cylinders)
43. Hydraulic brake fluid
44. Hydrochloric acid
45. Hydrogen (in cylinders)
46. Inks
47. Insulations
48. Iron
49. Kerosene
50. Lead
51. Lubricating oils
52. Lye (sodium hydroxide, potassium hydroxide)
53. Magnesium
54. Metals (aluminum, nickel, copper, zinc, cadmium, iron, etc.)
55. Methanol (methyl alcohol)
56. Methyl ethyl ketone (2-butanone)
57. Motor oil additives
58. Muriatic acid (hydrochloric acid)
59. Naphtha (coal tar)
60. Nitroglycerin
61. Oxalic acid
62. Ozone
63. Paint remover/stripper
64. Paints/lacquers
65. Particle board
66. Pentachlorophenol
67. Photographic developers and fixers
68. Photogravure ink (copy machine)
69. Plastics
70. Polishes for metal floors
71. Propanol
72. Putty
73. Resins, epoxy/synthetics
74. Sealers
75. Shellac
76. Solder, flux (zinc chloride, fluorides, etc.)
77. Solder, soft (lead, tin)
78. Solvents
79. Sulfuric acid
80. Thinner, paint/lacquer
81. Tin
82. Transite
83. Turpentine, gum spirit, oil of turpentine
84. Varnishes
85. Waterproofing agents
86. Waxes
87. Wood alcohol (methanol)
88. Wood preservative
89. Xylene

LEAD AWARENESS PROGRAM

If it is determined that there is a possibility that lead is present at the jobsite, a Company supervisor shall conduct a lead assessment pursuant to the following procedures:

1. Once it has been determined that lead is present in the workplace (either through a pre-construction environmental survey or through the discovery of lead during construction activities), the Superintendent will delay and/or cease operations on the project until an evaluation has been made by a 3rd party to determine the exposure limit to construction personnel.

2. The abatement contractor must conduct air sampling of their personnel to ensure no worker is exposed to hazardous levels of lead. Where the air sampling or assessment shows concentrations of lead at or above the action level, the abatement contractor must utilize protective methods (PPE, respirators, air filtration, etc.) to maintain a safe level of airborne lead concentrations that limit the exposure of lead to workers below the PEL.

Protective Methods must be employed by the abatement contractor. Company supervision should ensure that the following are being addressed by the contractor.

1. Appropriate respiratory protection in accordance with the OSHA regulation.

2. Appropriate PPE and equipment.

3. Change areas for employees to change clothing/PPE.

4. Hand washing facilities.

5. Biological monitoring through periodic blood sampling.

6. Training as required by OSHA to address hazard communication, protection methods, transportation and disposal, housekeeping, containment, etc.

The written abatement plan must be submitted to the necessary personnel for the general contractor and the Company President for review prior to commencement of work. The plan should:

1. Address the protective methods listed above and include copies of licenses and training certifications.

2. A description of each activity in which lead is emitted; e.g., equipment used, material involved, controls in place, crew size, employee job responsibilities, operating procedures, and maintenance practices.

3. Air monitoring data which documents the source of lead emissions.

4. A description of arrangements made among Trade Partners on multi-contractor sites with respect to informing affected employees of potential exposure to lead and with respect to responsibility for compliance.

5. Method for frequent and regular inspections of job sites, materials, and equipment to be made by a competent person.

Housekeeping Procedures:

1. All surfaces shall be maintained as free as practicable of accumulations of lead. Clean-up of floors and other surfaces where lead accumulates shall be done by HEPA filtered vacuuming or other methods that minimize the likelihood of lead becoming airborne.

2. Never use compressed air to clean any surface, unless there is a ventilation system designed to capture airborne contaminants.

BLOOD PATHOGENS SAFETY PROGRAM

Purpose

Drake Industries strives to provide all employees with a safe and healthy working environment. The prevention of injuries and health dangers is of primary importance. The purpose of the Company's Bloodborne Pathogens Written Safety Program is to limit employees' occupational exposure to blood and other potentially infectious materials per the requirements of OSHA standards 29 CFR 1910.1030 and 29 CFR 1926.50.

Scope

This program applies to any employee who can reasonably be expected to have contact with blood or other bodily fluids in performance of their job duties, whether in the Chandler shop/office facility or on the job site. Employees who may be affected by the standard are any considered a responder in a first aid emergency. These employees, generally foremen on the job site, risk coming into contact with blood and/or bodily fluids in the course of providing first aid. Another example of exposure is any employee that may come in contact with needles discarded at a job site or may have to assist in first aid.

Exposure Control

The foreman/supervisor or the designated entity shall review this plan and update it at least annually as required by the standard. The review and update will reflect new or modified tasks and procedures, and new or revised employee positions that affect occupational exposure.

The foreman/supervisor will investigate exposure incidents. The investigation should begin with the employee's supervisor completing a "Report of Significant Work Exposure to Bodily Fluids" and sending it to the foreman/supervisor within three days of the exposure. The foreman/supervisor will retain the original of the form, provide a copy of the form to appropriate persons and agencies, and provide the employee with a copy of the form.

The following items should be considered in the investigation:

1. Engineering controls, work practices, and personal protective equipment

2. Policies, including failure of control(s) at the time of the incident

3. How similar incidents can be avoided in the future

Exposure Determination

The supervisor or foreman is responsible for making a determination of who is likely to be exposed to bloodborne pathogens in the course of their work duties. Exposure determination is made without regard to the use of personal protective equipment and contains the following information:

1. Employees whose job responsibilities include occupational exposure through administration of first aid. In general, foremen and supervisors who carry first aid equipment on their trucks would be in this group.

2. Employees who might have exposure to bloodborne pathogens through accidental contact with discarded needles on the job site, or in an emergency may assist in the administration of first aid.

Methods of Compliance

Universal precautions should be observed by all employees at job sites and in the Company's office spaces to prevent contact with blood or potentially infectious materials. The definition of "universal precautions" is: "All human blood and certain human bodily fluids will be treated as if they are known to be infectious for HIV, HBV or other bloodborne pathogens." Where it is difficult to differentiate between bodily fluid types, all such bodily fluids shall be considered potentially infectious materials.

The following controls are established to eliminate or minimize exposure:

1. On the job site: per OSHA standard 1026.50, Appendix A, appropriate personal protective equipment, such as gloves and masks should be provided with the first-aid kits assigned to all employees expected to perform first aid as part of their duties.

2. If handwashing facilities are not reasonably accessible, antiseptic hand cleanser and clean cloths or paper towels will be provided.

3. All employees must wash their hands immediately (or as soon as feasible) after removal of gloves or other personal protective equipment.

4. All exposed employees must wash their hands or other skin with soap and water or flush mucous membranes with water as soon as possible following an exposure incident.

Engineering and work practice controls will be periodically reviewed and updated as new information becomes available and/or when new employee positions with potential exposure are created or when job duties change that may create potential exposure.

Personal Protective Measures

In the event of a first aid emergency or discovery of discarded medical sharps, employees must:

1. Utilize appropriate personal protective equipment in occupational exposure

situations during first aid treatment (at a minimum, latex gloves).

2. Remove garments that become penetrated by blood or other potentially infectious material immediately or as soon as feasible.

3. Remove all personal protective equipment before leaving the work area.

4. Clean and disinfect contaminated equipment and work surfaces with bleach and water after each first aid incident involving blood and/or bodily fluid.

5. If you encounter discarded sharps in the field, contact the Supervisor for disposal information.

Hepatitis B Vaccination and Post-Exposure Evaluations/Follow-up

The hepatitis B virus (HBV) vaccine is available at no cost within 24 hours after exposure to all employees who administer first aid as a secondary duty. An employee receiving post-exposure HBV vaccination will be provided with all the post-exposure follow-up procedures listed in this plan.

Following a report of an exposure incident, the exposed employee (if consenting) will receive a confidential medical evaluation and follow-up. The medical evaluation after exposure and medical follow-up will include at least the following:

1. Documentation of the route(s) of exposure.

2. A description of the circumstances under which the exposure occurred.

3. The identification and documentation of the source individual (The identification is not required if the employer can establish that identification is impossible or prohibited by the state or local law).

4. The collection and testing of the source individual's blood for HBV and HIV serological status.

5. Post-exposure treatment for the employee, when medically indicated, in accordance with the U.S. Public Health Service guidelines.

6. Counseling.

7. Evaluation of any reported illness.

The health care professional evaluating an employee will be provided with the following information:

1. A copy of OSHA Bloodborne Pathogens regulation (29 CFR 1910.1030).

2. A description of the exposed employee's duties as they relate to the exposure incident.

3. Documentation of the routes of exposure.

4. A description of the circumstances under which the exposure occurred.

5. Results of the source individual's blood testing, if available.

The employee will receive a copy of the evaluating health care professional's written opinion within fifteen days of the completion of the evaluation.

The health care professional's written opinion for hepatitis B vaccination is limited to the following:

1. Whether the employee needs hepatitis B vaccination; and

2. Whether the employee has received the vaccination.

The health care professional's written opinion for post-exposure evaluation and follow- up information is limited to the following:

1. The employee was informed of the results of the evaluation.

2. The employee was informed about any medical conditions resulting from exposure to blood or other infectious materials that require further evaluation or treatment.

3. All other findings or diagnoses will remain confidential and will not be in a written report.

Medical evaluations and procedures at no cost to the employee include the following:

1. The hepatitis B vaccine

2. The post-exposure evaluation and follow-up, including treatment

3. All medical evaluations made by or under the supervision of a licensed physician or by or under the supervision of another licensed health care professional.

4. Laboratory tests conducted by an accredited laboratory.

Medical records will be kept in accordance with 29 CFR 1910.20.

Hepatitis B Vaccine Declination

All employees have the legal right to decline the Hepatitis B vaccination at any time. If an employee of the Company refuses the Hepatitis B vaccine, the form required for this purpose will be provided to the employee.

Communication of Hazards to Employees

The following symbol indicates a biohazard label:

These labels are fluorescent orange or orange-red with lettering or symbols in a contrasting color. Labels must be affixed as close as possible to the container by means of string, wire, adhesive, or any other method that prevents its loss or unintentional removal. Red biohazard bags or red containers may be substituted for labels if it is necessary to dispose of materials containing blood or bodily fluids.

Employee Training

All employees with secondary occupational exposure must participate in the bloodborne pathogens awareness program. The program is available to the employee at the time of the first assignment to a task where occupational exposure could take place. Additional training will be provided whenever changes (such as job change or new procedures) affect the employee's occupational exposure. In general, foremen receive this training during the first aid segment of their annual, documented refresher training.

Recordkeeping

The Company is required to establish an accurate medical record for each employee with occupational exposure as required under 29 CFR 1910.20 and 1910.1030. OSHA requires that all medical and training records be available to the employee, to anyone having written consent of the employee, to the Director of the NIOSH, and to the Assistant Secretary of Labor.

The Company will maintain all medical records applicable to treatment of the employee, including vaccination status. They will be retained for a minimum of term of employment.

Training records will be maintained for three years from the date of training.

Plan Reviews

The Supervisor and/or Company President will review and update this plan at least annually to reflect new or modified tasks and procedures that affect occupational exposure and employee positions.

A copy of this plan will be kept at the Company's office and will be accessible employees electronically.

Definitions

1. Blood – human blood, human blood components, and products made from human blood.

2. Bloodborne Pathogens – pathogenic microorganisms that are present in human blood and can cause disease in humans, such as hepatitis and human immunodeficiency virus (HIV).

3. Contaminated – the presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.

4. Contaminated Laundry – laundry, which has been soiled with blood or other potentially infectious materials on an item or surface.

5. Contaminated Sharps – any contaminated object that can penetrate the skin including, but not limited to, needles and broken glass.

6. Decontamination – use of physical or chemical means to remove, inactivate, or destroy bloodborne pathogens on a surface or item to the point they are no longer capable of transmitting infection and the surface or item is safe for handling, use, or disposal.

7. Engineering Controls – controls that isolate or remove the bloodborne pathogens hazard from the workplace.

8. Exposure Incident – a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral (such as injection) contact with blood or other potentially infectious materials in the performance of an employee's job duties.

9. Handwashing Facilities – a facility providing an adequate supply of running potable water, soap, and single use towels or hot air drying machines.

10. Licensed Healthcare Professional – a person whose legally permitted scope of practice allows him or her to independently perform Hepatitis B vaccination and post-exposure evaluation and follow-up.

11. HBV – Hepatitis B virus

12. HIV – Human Immunodeficiency virus

13. Occupational Exposure – reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties. For example, performance of first aid could be considered an occupational exposure if considered part of the job, whereas a

14. “Good Samaritan” act such as helping a co-worker with a nosebleed would not be considered occupational exposure.

15. Personal Protective Equipment (PPE) – specialized clothing or equipment worn by an employee for protection against a hazard. General work clothes are not considered PPE. In most cases, PPE would consist of wearing latex gloves when administering first aid.

16. Universal Precautions – an approach to infection control in which all human blood and certain bodily fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne pathogens.

17. Work Practice Controls – controls that reduce the likelihood of exposure by alternating the manner in which a task is performed (e.g. prohibiting administration of first aid without wearing rubber gloves).

BENZENE AWARENESS PROGRAM

Purpose of Policy

To provide a hazard free workplace and have a Benzene Protection Program to ensure the safety and health of all Drake Industries’ employees performing job tasks in which a potential lead exposure could occur.

Compliance with this program is mandatory and is applicable to all Drake Industries’ employees who work in an environment where benzene is present in any amount. Failure to comply will result in disciplinary action and/or is grounds for termination.

What Is Benzene?

Benzene is a colorless, highly flammable liquid chemical with a sweet odor. It has been produced from coal since 1849 and from petroleum since 1941 and is a chemical familiar to many oil, gas and chemical workers. Smoking is prohibited in areas where benzene is used or stored.

Benzene is known as an "aromatic hydrocarbon". Chemicals that are composed of only hydrogen and carbon are called hydrocarbons. Because of the distinctive smell of benzene (and related compounds), the benzene family is classified as "aromatic"; thus, the name, aromatic hydrocarbon. Benzene has an odor threshold of 12 ppm (12 x the OSHA PEL); therefore, not smelling it does not mean you are not being exposed. Benzene is a recognized carcinogen.

Purposes of Benzene

Benzene is a valuable raw material and intermediate in the production of other organic chemicals. These chemicals include ethylbenzene, phenol, cyclohexane, styrene and maleic anhydride. Smaller amounts of benzene are used in manufacturing detergents, explosives, pharmaceuticals and dyestuffs. Benzene has become almost indispensable to the chemical industry

and the wide range of its applications makes it especially imperative that every precaution be observed in its use.

Some examples of uses of benzene include:

1. Additive in motor fuel. Large quantities of benzene go into the production of gasoline.

2. Used extensively in the manufacture of many chemical compounds because it reacts easily with various chemicals, making the production of new chemicals much easier and faster. Used in the making of styrene, phenols, detergents, explosives, medicines and dyes.

3. Benzene was used widely as a solvent. Its ability to dissolve organic compounds made it popular in the production of rubber, plastics, paints, inks, oil, and fats. It vaporizes easily and was used in processes where fast drying was necessary.

Health Hazards Associated with Exposure to Benzene

Benzene poisoning occurs primarily through inhalation of its vapors. Although benzene can penetrate the skin, intact skin does not easily absorb benzene into the body. Benzene primarily attacks the blood-forming tissues of the body. Benzene damages the bone marrow where red blood cells, white blood cells and platelets are formed. These three components make up the blood and a shortage of any one of them will result in serious blood disease. Benzene is known to affect all three of these components and thus workers exposed to benzene show a variety of blood diseases.

Among the various blood diseases are anemia (shortage of red blood cells); leukopenia (shortage of white blood cells); and thrombocytopenia (shortage of platelets). Most serious is benzene's ability to cause leukemia, a fatal cancer of the white cell producing tissue. There are many types of leukemia classified by the duration and character of the disease as well as the type of cell involved. Acute leukemia, as the name implies, progresses rapidly while chronic leukemia develops slowly.

Acute Benzene Poisoning refers to an exposure to a high level of benzene in a short period. This type of exposure usually happens in an enclosed space such as a tank or vessel with benzene residues, or from spills or equipment failure. Acute poisoning affects the central nervous system with symptoms such as dizziness, excitement, staggering gait; also, headache, nausea, fatigue, insomnia, flushed face, incoherent speech, tingling in hands and feet. Symptoms can last up to two weeks and the length of recovery will depend on the severity of exposure. However, if the exposure is severe enough, the breathing center of the brain is paralyzed, and death occurs.

First aid for acute poisoning includes keeping the victim calm and quiet and move the victim to fresh air; CPR may be necessary. If benzene has meet skin or eyes, remove contaminated clothing and flush affected area for 15 minutes.

Chronic Benzene Poisoning refers to exposure to low levels of benzene over a long period. This is the more common form of industrial benzene poisoning. In addition, if a person is rescued from an acute exposure, he or she may then develop chronic, long-lasting effects.

Symptoms of chronic benzene poisoning are vague and thus deceptive. Tiredness, dizziness, headache, nausea, loss of appetite, weight loss and general weakness can easily be attributed to other causes. It is only later during the disease that nosebleeds, bleeding gums, pallor and purple disfigurations appear. Benzene may also cause damage to chromosomes, and that chromosomal damage also confirms the cancer-causing potential of benzene.

OSHA Standard Regarding Benzene – 29 CFR 1910.1028

The permissible exposure limit (PEL) was set by OSHA at one part per million (ppm) of benzene in the air. The standard calls for a 15- minute short-term exposure limit (STEL) of 5 ppm. The short-term limit was included because studies of refinery workers show excess leukemia risk among pipe fitters, maintenance workers, and in other jobs where intermittent peak exposures to benzene occur. This level of exposure is NOT typical of Drake Industries employees due to the Company's work not being performed in or near facilities producing or using benzene.

The action level of O.5 ppm triggers other provisions of the standard including methods of compliance, personal protective equipment, employee monitoring, medical surveillance, medical removal protection, hazard communication, regulated areas and record-keeping. Loading and unloading operations at bulk wholesale storage facilities which use vapor control systems for all loading and unloading operations are excluded.

Monitoring

The Standard lays out the requirements for initial air monitoring, periodic monitoring, and monitoring frequency. Representative 8-hour time weighted average (TWA) employee exposures shall be determined based on one sample or samples representing the full shift exposure for each job classification in each work area. To determine compliance with 5 ppm, 15 minute STEL, operations should be measured where exposures are believed to be high such as where tanks are opened, filled, unloaded or gauged; where containers or process equipment are opened and where benzene is used for cleaning or as a solvent in an uncontrolled situation.

If the initial monitoring shows employee exposure above the TWA, Drake Industries will repeat the monitoring at least every six months while the exposure exists. If the initial monitoring shows exposures at or below the TWA, Drake Industries will repeat the monitoring for each such employee every year that the exposure exists. The monitoring frequency depends on the exposure levels. Drake Industries is required to monitor whenever there is a change in production, process, control equipment, personnel or work practices which may lead to additional or new benzene exposures. Employees must be notified, within 15 working days of receipt of results, of the monitoring results and employees or their designated representatives must be allowed to observe the monitoring.

Regulated Areas

When necessary, the Company will establish a regulated area limiting access to authorized persons, when benzene concentrations exceed or are expected to exceed the permissible exposure limits, either the 8-hour average or the 15-minute limit.

Note: OSHA considers "designated representative of employees" for exercising the right to observe monitoring and measuring procedures as an authorized person.

Benzene may be found at the following areas:

1. Petroleum refining sites

2. Tank Gauging (tanks at producing, pipeline & refining operations)

3. Field maintenance locations

Methods of Compliance

The nature of job activities sometimes involves working within environments where there is a potential for benzene exposure. Prior to commencing work on a job site where potential benzene exposure is identified as a hazard, a pre-job investigation should be conducted and personnel should move to an area with fresh air. The Benzene Protection Program incorporates the entire OSHA Benzene standard, Title 29 CFR 1926.1128, which simply references 29 CFR 1910.1028, by:

1. Ensuring that no employees are exposed to benzene at concentrations greater than 1 ppm over an eight 8-hour time weight average (TWA) or the short-term exposure limit (STEL) of 5 ppm for 15 minutes.

2. Knowing when respirators are used to limit employee exposure as required by paragraph (c) of Section 1910.1028, and all requirements of paragraphs (g) of Section1910.1028, have been met, employee exposure may be considered to be at the level provided by the protection factor of the respirator for those periods the respirator is worn. Those periods may be averaged with exposure levels during periods when respirators are not worn to determine the employee's daily TWA exposure.

During work activities, the site manager or supervisor will periodically inspect the area to maintain the effectiveness of the benzene protection program. If the inspection reveals a change in the work environment that could increase potential benzene exposure, all employees will evacuate the area and a follow-up benzene assessment will be completed and the necessary additional precautions will be implemented before work activities resume.

Controlling Beneze Exposures

Preventing the deadly hazards of benzene exposure requires a comprehensive and on-going occupational health program including medical examinations, biological and air monitoring, engineering controls, personal protective equipment and protective clothing, employee education, work practices and record-keeping. Below are some control measures which apply to benzene or any other cancer-causing substance.

1. When a safer substitute is available, benzene should never be used.

2. In the production as well as use of benzene as a raw material or intermediate in chemical manufacture, the process should be completely enclosed. A regulated area should be established so that entry and exit into a benzene area is controlled. Direct exhaust ventilation should also be provided to control possible exposure during maintenance and repair work.

3. Regular air monitoring for benzene should be conducted to determine if control measures are effective. Employees should be allowed to observe the monitoring and results should be retained for 30 years and available to employees upon request.

4. Employees at risk of exposure will be provided with appropriate protective clothing (coveralls or other full-body clothing) and gloves impervious to benzene which should be changed daily and laundered at the Company's expense. Separate lockers will be provided for work clothes and street clothes. Showers should be taken at the end of the workday before the employee goes home.

5. Where there is the possibility of contact with liquid benzene, splash-proof face shields and goggles must be worn.

6. Special procedures should be set up for maintenance work and entry into tanks or other enclosed spaces.

7. The Company will keep exposure below 10 ppm through the use of recommended engineering and work practice controls, unless proven to not be feasible.

Medical Exams

Workers exposed to benzene should take regular medical examinations. (Exposed to benzene means that there are measurable concentrations in the workplace air.) The frequency will depend on the extent of the worker's exposure. Any medical surveillance will be at no expense to the employee and should not be conducted by the company.

All medical examinations will be conducted by an outside independent physician. In this way, we can protect the worker and insure confidentiality of results. The only person receiving individual test results will be the individual taking the test and his or her personal physician, if so desired.

Precautions for Safe Use, Handling and Storage

Fire extinguishers must be readily available in areas where benzene is used and stored. Because benzene is highly flammable it will be stored in tightly closed containers in a cool, well-ventilated area. Benzene vapor may form explosive mixtures in air. All sources of ignition must be controlled. Use non-sparking tools when opening or closing benzene containers. Fire extinguishers, where provided, must be readily available. Know where they are located and how to operate them. Smoking is prohibited in areas where benzene is used or stored.

All portable fire extinguishers shall be checked annually by a qualified fire extinguisher maintenance service. All Drake Industries employees will be trained in the proper use of portable fire extinguishers.

Training and Training Records

Benzene Awareness Training will be conducted for all Company employees who are assigned to work in any area where there is a known occupational exposure to benzene. The Company will provide every worker with information outlining how and where benzene is used in the plant, safe methods of handling, hazards involved, proper maintenance and cleanup methods, proper respirator usage and a description of medical surveillance and air monitoring programs. This information will also contain a description of emergency first aid procedures for benzene

Training records shall be maintained on file with the Company. Non-compliance by any employee with any part of this described program will result in disciplinary action as outlined in the Company's Corrective Action and Disciplinary Program found in this manual

LADDER SAFETY PROGRAM

Purpose

This program establishes the training, inspection, and operating requirements concerning the use of ladders used by Drake Industries' employees. The program is being implemented to educate employees to recognize and avoid hazards related to the use ladders

This program applies to all employees of Drake Industries and any subcontractors that Drake Industries engages to work on any site at which Drake Industries performs work. Due to the Company's work not involving scaffolds and elevated platforms, this Ladder Safety Program does not discuss such topics.

Definitions

1. Combination Ladder: a portable ladder capable of being used either as a stepladder or as a single or extension ladder. It may also be capable of being used as a trestle ladder or a stairwell ladder.

2. Competent Person: a person capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has the authorization to take prompt corrective measures to eliminate them.

3. Extension Ladders: non-self-supporting portable ladder adjustable in length. It consists of two or more sections in guides or brackets or the equivalent and so arranged as to permit adjustment.

4. Fixed Ladders: any ladder that is permanently attached to a structure.

5. Ladder: device incorporating or employing steps, rungs, or cleats on which a person may

step to ascend or descend.

6. Ladder Safety System: an assembly of components whose function is to arrest the fall of a user, including the carrier and its associated attachment elements (brackets, fasteners, etc.), safety sleeve, body support, and connectors, wherein the carrier is permanently attached to the climbing face of the ladder or immediately adjacent to the structure.

7. Platforms: landing surface that is used as a working standing location.

8. Rail: the side members joined at intervals by either rungs or steps.

9. Stepladders: a self-supporting portable ladder, non-adjustable in length, with flat steps and a hinged base. They are designed to support one person along with all necessary equipment (tools, materials, etc.) and they are constructed under the following general classes:

    a. Type I – Industrial, heavy-duty ladder with load capacity, not more than 250 pounds.

    b. Type IA – Extra-heavy industrial ladder with load capacity, not more than 300 pounds.

    c. Type II – Commercial, medium-duty ladder with load capacity, not more than 225 pounds.

    d. Type III – Household, light-duty with load capacity, not more than 200 pounds.

10. Step Stools (ladder type): a self-supporting, foldable, portable ladder, non-adjustable in length, 32-inches or less in overall size, with flat steps and without a pail shelf, designed to be climbed on the ladder top cap so that the ladder top cap, as well as all steps, can be climbed. The side rails may continue above the top cap.

11. Top Cap: the uppermost horizontal member of a portable stepladder.

12. Top Step: the first step below the top cap of a portable stepladder. Where a ladder is constructed without a top cap, the top step is the first step below the top of the rails.

13. Working Length: the length of a non-self-supporting portable ladder measured along the rails from the base support of the ladder to the point of bearing at the top.

14. Working Load: the maximum applied load, including the weight of the user, materials, and tools, that the ladder is support for the intended use.

Responsible Parties

The Company's President has the responsibility to develop specific policies and procedures about the operation and maintenance of the Company's ladders as necessary and to enforce

employee compliance with this program. All appropriate employees and all new employees must be trained and responsible for the purpose and the use of this program.

Supervisors have the responsibility to arrange for the training of employees who use portable ladders and ensuring the ladders under their responsibility are properly inspected and maintained in a safe operating condition using the form below.

Employees have the responsibility to safely using portable ladders, inspect ladders in their areas and completing the required inspection, and report equipment defects and/or maintenance needs immediately

Ladder Construction Requirements

Fixed and portable ladders and step stools shall at minimum meet the appropriate Occupational Safety and Health Administration (OSHA) and American National Standards Institute (ANSI) A14.1 materials and construction specifications.

Newly installed fixed ladders that are 24-feet or longer shall be outfitted with a ladder safety system. Existing fixed ladders that are 24-feet or longer must be retrofit with a ladder safety system before November 18, 2036.

Portable ladders shall display the appropriate legible ANSI standard compliance marking and other ladder markings. Labels/markings must be replaced when they are no longer legible.

Ladder Usage

Ladders should be used in accordance with the following policies and procedures:

1. Intended Use - Ladder use shall be restricted to the purpose for which the ladder was designed.

    a. The duty rating of the ladder must be indicated on the ladder. The working load to be placed on the ladder including the person and tools must be less than the duty rating.

    b. Ladders shall not be climbed by more than one person at a time unless designed to support more than one person.

    c. Stepladders shall not be used as single ladders or in a closed or partially closed position.

    d. The user shall not step or stand higher than the step or rung indicated on the label marking the highest standing level on a ladder.

    e. The user shall not step or stand on the ladder top cap and the top step of a stepladder or a combination ladder configured as a self-supporting ladder.

    f. The rear braces of a stepladder may not be used for climbing.

2. Angle of Inclination – Portable non-self-supporting ladders should be erected at a pitch of approximately 75 degrees from horizontal for optimum resistance to sliding, the strength of the ladder, and balance of the climber. A simple rule for setting up a ladder at the proper angle is to place the base a distance from the wall or upper support equal to one-quarter of the effective working length of the ladder. The effective working length is the distance along the side rails from the bottom of the support point of the upper portion of the ladder.

3. Footing Support – The ladder base shall be placed with a secure footing on a firm, level support surface. Ladder levelers may be used to achieve equal rail support on uneven surfaces. Devices such as shoes, spurs, spikes, combinations thereof, or similar device of substantial design should be installed where required for slip resistance and bearing areas. Where ladders with no safety shoes, spurs, spikes or similar devices are used, a foot ladder board or similar device may be employed. Ladders shall not be used on ice, snow, or slippery surfaces unless suitable means to prevent slipping are employed. Ladders shall not be placed on boxes, barrels, or other unstable bases to obtain additional height.

4. Top Support – The top of a non-self-supporting ladder shall be placed with the two rails supported equally unless it is equipped with a single support attachment. Such an attachment should be substantial and large enough to support the ladder under load. It should be used when the ladder top support is a pole, light standard, or building corner, or in tree-type operations.

5. Side Loading – Portable ladders are not designed for excessive side loading, and such abuse of the ladder shall be avoided. The ladder shall be kept close to the work. The user shall not overreach, but shall descend and relocate the ladder instead. When using a ladder, the user shall never push or pull unless the ladder is properly secured.

6. Climbing Ladders – When ascending or descending the ladder, the user shall face the ladder and maintain a firm hold on the ladder. It is preferable to grasp the rungs with an overhand grip as opposed to grabbing the rails. Grip strength is improved while grasping the rungs. Three points of contact with the ladder should be maintained at all times. The recommended climbing pattern is hand, hand-foot, foot. Belt buckle area of the body should remain centered on the ladder and never extend beyond the side rails.

7. Electrical Hazards – Users are cautioned to take proper safety measures when ladders are used in areas containing electrical circuits. These precautions should prevent any contact or possible contact with an energized, uninsulated circuit or conductor to avoid electrical shock or short circuit. Metal ladders and wood ladders with side-rail metal reinforcement wires shall not be used where they would come in contact with exposed energized electric wires. All ladders should be kept away from electric power lines. It is imperative to also take precautions to avoid contact with electrical circuits with tools that are in use while on the ladder.

8. Access to Roof or Platform – When a single section or extension ladders are used to gain access to a roof or platform, the top of the ladder shall extend at least 3-feet above the point

of support at the eaves, gutter, platform or roofline. The user shall take care when ascending from the ladder to the roof or/platform or descending from the roof/platform to the ladder to avoid tipping the ladder over sideways or causing the ladder base to slide.

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

10. Set-Up and Adjustment of Ladders

    a. Extension Ladders – Adjustment of extension ladders shall only be made by the user when standing at the base of the ladder so the user may observe when the locks are properly engaged. The user shall check that the rope is tracking correctly in the pulley. Adjustment of extension ladders from the top of the ladder (or any level over the locking devices) is a dangerous practice and shall not be attempted. Adjustments shall not be made while anyone is standing on the ladder. The user shall ensure that both upper and lower ladder support points are contacting firm support surfaces. Combination ladders used in a non-self-supporting configuration require that the same procedures be observed.

    b. Stepladders – The user shall ensure that the stepladder is fully opened, with spreaders locked and all feet in contact with a firm and level support surface.

11. Wood Ladder Use Restriction – Wood ladders are prohibited for use for Drake Industries' employees. Fiberglass ladders or aluminum ladders may be used depending on the specific application.

Training Requirements

Drake Industries will provide training to ensure that all managers, supervisors, and employees to understand the purpose and function of this program and general ladder safety. Training will be as follows:

1. Initial Training is conducted by Drake Industries for all new employees. Employees will be trained to recognize hazards related to ladders. Also, employees will be trained on the maximum intended load-carrying capacities of ladders; the proper placement of ladders and inspection criteria.

2. Refresher Training is a general regulatory overview conducted every three years by Drake Industries managers, supervisors and employees.

3. Training records maintained by Drake Industries and will be retained for 3 years from the date on which the training occurred.

Ladder Inspections

Drake Industries supervisors and employees shall inspect ladders prior to every use. Further, a supervisor must inspect every new ladder or modified ladder upon receipt of the new or modified ladder.

For Pre-Use Inspections, the ladder will be inspected before use to verify the equipment is safe to operate. If at any time the ladder is found to be unsafe, the employee will immediately notify their supervisor and remove the equipment from service.

Supervisors will also perform periodic inspections on an annual basis pursuant to the manufacturer's recommendations and to ensure proper functionality.

Any ladders that are identified to have defects shall be withdrawn from service for repair or destruction and tagged "Dangerous, Do Not Use." Any requirements for repair or replacement of the ladder or its components will need to be rectified before that ladder being returned for use. The Company will keep records of its ladder inspections for 12 months.

Subcontractors and Vendors

Any subcontractors and vendors shall be responsible for supplying and using their portable ladders while performing work on behalf of, or at the request of, Drake Industries.

Review and Reminders

The Company will review this program annually. Below are reminders that each employee should remember when working with or around ladders:

1. All ladders must be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use to ensure safe working condition.

2. All defective or damaged ladders must be immediately removed from service and no longer used until repaired or replaced.

3. Ladders must be used only for the approved and intended purpose for which they were designed.

4. Non-self-supporting or straight ladders must be erected on a sound and solid support, level with the base of the ladder, a distance equal to 1 to 4 ratio from the support structure.

5. Metal ladders or ladders with metal components are not allowed for use near or around electrical wiring or installations.

6. Ladders used to reach elevated working surfaces or roofs will extend not less than three feet (36 inches) above the level to be accessed.

7. Ladders should never be painted or altered in a manner that could hide or prevent the recognition of defects.

8. Ladders must be tied, blocked or otherwise supported to prevent them from being displaced.

9. Only one person is allowed on a ladder at a time.

10. The top two steps of a stepladder must not be used as steps.

11. Areas at the foot and top of ladders should be kept clear of debris and stored materials.

12. Stepladders must be equipped with a metal spreader or locking device to securely hold the front and back sections in place and should be used only when fully opened. Stepladders should not be used as straight ladders.

13. Ladders should not be used in passageways, around doorways or in other areas where accidental displacement could occur while the ladder is in use.

14. Ladders must be maintained free of oil, grease and other slipping hazards.

15. Ladders should not be moved, shifted or extended while occupied. The walking of ladders is not allowed.

16. Ladders must not be loaded beyond the maximum intended load for which they were built, nor beyond their manufacturer's rated capacity.

17. When climbing or descending a ladder, the user should face the ladder and use at least one hand to hold on to the ladder at all times. No object or load should be carried that could cause the user to loose balance and fall.

PANDEMIC PREPAREDNESS PROGRAM

Purpose

The purpose of this Pandemic Response Plan (Plan) is to ensure the health and safety of Company employees through proper planning. Pandemics are the result of an infectious disease that has spread globally and will be addressed by the Company on a case by case basis upon onset. This plan outlines the Company's general guidelines in response to a pandemic and specific elements that may be developed and implemented once the nature and characteristics of the disease are known.

Scope

All Company employees are expected to adhere to the plan components that can influence their health and safety and the health and safety of others. When a pandemic occurs, the expectation is that any subcontractor, vendor, supplier of the Company that are present at a jobsite

that the Company is performing work will be required to follow established guidelines and procedures of the plan while working or visiting the Company's site location.

Definitions

Epidemic: The occurrence of more cases of disease than expected in a given area or among a specific group of people over a particular period of time.

Influenza Pandemic: Occurs when a new influenza virus emerges and spreads around the world as most people do not have immunity.

Infectious Disease: Infectious diseases are caused by pathogenic microorganisms, such as bacteria, viruses, parasites or fungi; the diseases can be spread, directly or indirectly, from on person to another.

Pandemic: The global outbreak of disease. Pandemics happen when a new virus emerges to infect people and can spread between people sustainably. Because there is little to no pre-existing immunity against the new virus, it spreads worldwide. In order to be considered a Pandemic, the disease must be infectious and contagious.

Responsibilities

Company Executive Management: Develop comprehensive companywide pandemic guidance program and designated support personnel to assist in development of pandemic specific guidance and procedures, if necessary.

Support Personnel: Support personnel will develop and provide specific pandemic program information and processes to senior leadership. Support personnel may include the Human Resources Department or any other business unit deemed necessary, such as the safety team assigned by the general contractor at any particular jobsite.

Company Supervisors and Foremen: Work in concert with Company Executive Management and Support personnel to implement, manage, and maintain day-to-day pandemic specific procedures and processes at specific jobsite location. Keep abreast of and implement respective state and local regulations or emergency orders that may be more stringent or area specific.

Employees: Follow and implement pandemic-related guidance and procedures in accordance with the Plan and as directed by the Company. Provide feedback to supervisors and foremen on the effectiveness of the Plan.

Subcontractors, Vendors and Suppliers: Subcontractors, vendors and suppliers will be required to comply with elements of this Plan and any other related government orders.

Customers and Visitors: Customers and visitors visiting the Company at any jobsite will be required to comply with the guidelines established by the plan.

Procedures

Risk Assessment

The Company's Executive Management will assess the potential for harm associated with the pandemic by identifying the hazard, evaluating who may potentially harmed; evaluate how employees and the business may be harmed, assess the risk posed to the Company's employees and those working or visiting the Company at a jobsite. The actions taken will be reviewed and modified as the pandemic and surrounding conditions evolve.

Available resources to assist the development of the pandemic guidelines the Center for Disease Control (CDC), state and local health departments, federal OSHA, state OSHA (State run plans), and emergency orders from the state governors' offices.

Mitigation Strategies

The methods of transmission of the disease will be evaluated and appropriate mitigation strategies will be developed and implemented. The following tasks should be considered as a part of the Company's mitigation strategies:

- Develop and implement safe practices guidelines consistent with the type of work; performed and personal interactions anticipated (Site or activity specific safety plans)
- Require employees to stay home when sick or displaying symptoms consistent with the pandemic disease;
- Develop and implement procedures for cleaning and disinfecting commonly touched surfaces and machinery;
- Develop and implement procedures for addressing persons who develop the illness while at work. Send them home and advise to seek medical attention;
- Develop cleaning and disinfection practices of areas where sick persons were working; and
- Evaluate travel policy and impose travel restrictions as needed.

Mitigation measures may vary depending on the nature of the disease. The following are general guidelines to follow in the event of a pandemic and will be enhanced and/or modified depending on the nature of the disease.

- Stay home, or return home, if you are sick or exhibiting symptoms
- Report symptoms to your supervisor upon onset and if symptoms return
- Consult with your primary care provider if you may be symptomatic

- Avoid in person meetings
- Conduct meetings virtually as much as possible
- Wash your hands often with soap and water for at least 20 seconds or use an alcohol-based hand sanitizer with at least 60% ethanol or 70% isopropanol
- Clean and disinfect frequently touched surfaces often
- Avoid shaking hands, fist or elbow bumps
- Avoid touching your face, eyes, nose and mouth
- Maintain physical distancing as determined by the CDC (such as by staying 6 or more feet away from others)
- Cover your cough or sneeze with a tissue and throw it away immediately
- Use EPA approved disinfectants
- Consult with your supervisor regarding current and future business or personal travel plans

Communication

Pandemic mitigation guidance and pandemic status will be routinely provided to employees through regular business communications which will include in person or virtual conferences, telephone conferences, e-mails, safety alerts and bulletins.

- Provide information to employees to educate them on the nature of the pandemic, how it is transmitted from one person to another, and practices and procedures to mitigate transmission
- Monitor appropriate local, state, and federal orders and updates for the latest information related to the pandemic
- Provide frequent updates about the pandemic as it evolves
- Provide periodic advisories and alerts as conditions, operations and processes change
- Activity specific safety plans developed in response to the pandemic are to be made available to a regulatory agency upon request. Company employees should make their manager aware of requests for documents from regulatory agencies

Pandemic Training

All employees will be trained in the nature of the pandemic, how it transmitted, how to prevent transmission and how and when to seek medical attention. Employees will receive additional pandemic training specific to their responsibilities once the guidelines are developed. In the interim, employees should follow the guidelines set forth in this plan, guidance from the CDC, emergency state orders and their respective state and federal departments of health.

References for Pandemic Information

- Center for Disease Control (CDC) Website: www.cdc.gov
- Occupational Safety and Health Administration (OSHA): www.osha.gov

ENVIRONMENTAL EXPOSURE PROGRAM

Heat Illness

Heat related incidents can occur in many different workplace environments. The foreman or supervisor must review appropriate heat illness prevention measures in the spring with all Company employees before temperatures and humidity begin to rise in their area.

The Supervisor is responsible for:

1. Ensuring employees are trained to recognize the Heat Stress Hazards.
2. Making sure an adequate supply of water for Company employees is available.
3. Making sure shade and rest breaks are offered and taken.
4. Ensuring that heat acclimatization is practiced, and the competent persons representing the Subcontractors are properly trained and supply adequate water for their workers.
5. Understanding and providing prompt medical attention how to deal with heat related emergencies.

Procedure for Preventing Heat Illness

Recognize the Hazard

Temperatures as low as 70 degrees can represent a risk if workers are wearing personal protective clothing. When temperatures reach 80 degrees plus, action must be taken to reduce heat illness and at 95 degrees plus, heat risk reduction is a major concern.

Weather should be monitored daily and can be monitored by visiting one of the sources below.

- Local TV, Internet, Radio weather reports.

- www.weather.com
- www.nws.noaa.gov

Types of Heat Illness

- Heat rash
- Fainting
- Heat cramps
- Heat exhaustion
- Heat stroke

Early symptoms of Heat Illness include:

- Headache
- Muscle cramps
- Unusual fatigue

More serious Heat Illness symptoms include:

- Unusual behavior
- Nausea/vomiting
- Weakness or Fainting or loss of consciousness
- Rapid pulse
- Excessive sweating
- **Any of these symptoms require immediate attention. **

Availability of Water

- Water containers shall be cleaned and sanitized on a regular and frequent basis to maintain a hygienic supply of water.
- Water containers should be inspected frequently during the work shift to maintain adequate quantities and quality of water.
- The water temperature should be cooler than ambient temperature but not cool to cause discomfort.

- Make sure a free adequate supply of fresh, pure, suitably cool, clean drinking water is available. Each contractor is responsible to provide an adequate supply of potable water. Every worker needs to drink at least 1 quart / 4 cups of water per hour.

- The water supply, single serving cups and trash receptacle shall be provided and should be located as close to the work area as practical. Use of a common drinking cup is prohibited.

- Workers who bring individual containers will adequately label their containers to prevent cross contamination or sharing containers with other workers.

Access to shade

- Make sure adequate shade is provided and rest breaks are taken. Shade should be located as close as practical area to the job site within a 2-3-minute walking distance.

- Shade is required to be present when the temperature exceeds 80 degrees Fahrenheit. The amount of shade to be provided shall be at least enough to accommodate 25% of Workers on shift at any time.

- Rest breaks are important to provide time for cooling and provide an opportunity to drink water. Rest breaks should be no less than five (5) minutes duration.

- Water should be made available at the rest stations. Air movers or fans are also recommended at these areas if feasible.

- Workers shall be allowed and encouraged to utilize these rest areas to take preventative cool down breaks. These areas should be monitored, and workers asked if they are experiencing any heat illness symptoms. Workers should be encouraged to remain in these areas until heat related symptoms are abated, but no less than 5 minutes.

- Shade must be available when the temperature does not exceed 80 degrees Fahrenheit. When requested by workers.

High Heat Procedures

- When temperature exceeds 95 degrees Fahrenheit, high-heat procedures need to be implemented.

- A safety meeting (tailgate talk) should be held before the workday begins to remind workers of the heat stress hazards and to stay hydrated and take breaks during the workday.

- Ensure effective communication (i.e., Cell phone or two-way radio) are available at all times so Workers can contact a supervisor when necessary.

- Workers may utilize the “Buddy System” to keep eyes on each other.

- All Workers should be observed for alertness and signs or symptom of heat illness. Supervisors may not be responsible to observe more than 20 workers at a time.

- Supervisors should remind workers throughout the day to drink water, even if they are not thirsty.

- New Workers to the job site should be kept under close supervision for the first 14 days unless the worker has indicated they have been doing similar work outdoors for 10 of the past 30 days for 4 or more hours per day.

- First Aid / Emergency treatment for workers suffering from heat illness symptoms shall be readily available.

Emergency Response Procedures

- Use the established communication methods to contact local site supervision to respond to the emergency.

- First aid trained employees shall be summoned to evaluate / treat the distressed worker.

- 9-1-1 is to be called for all confirmed heat emergencies (Exhaustion & Stroke).

- Begin treatment for heat illness. (First Aid Training) Shade and cooling are paramount.

- Post other standby workers to direct emergency medical services (EMS) to the injured workers' location on the site.

- If the injured worker is transported to the hospital by another worker / supervisor, directions to the closest medical facility are to be posted in all construction offices.

Heat Acclimatization

Acclimatization is a physical change that allows the body to build tolerance to working in the heat. It occurs by gradually increasing workloads and exposure and taking frequent breaks for water and rest in the shade. Full acclimatization may take up to 14 days or longer depending on factors relating to the individual, such as increased risk of heat illness due to certain medications or medical conditions, or the environment.

New workers and those returning from a prolonged absence should begin with 20% of the workload on the first day, increasing incrementally by no more than 20% each subsequent day. During a rapid change leading to excessively hot weather or conditions such as a heat wave, even experienced workers should begin on the first day of work in excessive heat with 50% of the normal workload and time spent in the hot environment, 60% on the second day, 80% on day three, and 100% on the fourth day.

Workers need to acclimate themselves to warmer temperatures.

- Workers need their bodies to adjust to working in heat if:

- Returning to work after a prolonged absence or recent illness,
- Recently moving from a cool to hot climate; or
- Working during the beginning stages of a heat wave.
- For heavy work in hot temperatures, a period of 4 to 10 days of progressively increasing work time starting with about 2 hours work per day is recommended.
- Less severe heat conditions, at least 2-3 days of work in the heat should be limited to 2-4 hours.

Training for Workers and Supervisors Should Include

- Implement a Safety Meeting at the project site prior to the onset of hot weather, late spring early summer. Training should include but not limited to:
    - How to recognize Signs and Symptoms of heat stress injuries and treatment of same. (Red Cross or Equivalent - First Aid / CPR/AED Training)
    - Procedures for acclimatization
    - The need to drink water frequently and the importance of choosing water instead of soda or other caffeinated beverages and avoiding alcoholic beverages all together during high heat.
    - The need to take breaks out of the heat
    - How to contact emergency services and report work location.

PERSONAL PROTECTIVE EQUIPMENT

The use of personal protective and safety equipment (PPE) is a control measure that is to be used only after hazards have been identified with a particular job or activity, and it is determined that the hazards cannot be eliminated and/or controlled to an acceptable level through administrative actions.

Based on hazard evaluations supervisors shall identify and select, and each affected employee shall use PPE that will provide appropriate protection. Supervisors shall communicate PPE decisions to each affected employee. Employees shall use all PPE that may be required to maintain their exposure within acceptable limits.

Minimum Requirements

All Company employees and site visitors shall wear the described PPE and clothing suitable for the weather and work conditions until such time that the supervisor determines that the project environment or designated area thereof no longer requires the use of personal protective equipment. At such time as the supervisor determines an area safe for activity without the use of

PPE, the supervisor shall notify employees in writing of the area for which PPE is no longer required. For fieldwork (e.g., construction sites, survey or inspection activities, regulatory inspections, etc.), as a minimum, this shall be:

1. Hard Hat - ANSI Z89.1 approved (No bump caps, arborist hats, or soft caps worn under hard hat).

2. Short sleeve shirt (no offensive, vulgar, profane language or illustrations visible)

3. Long pants (excessively long or baggy pants are prohibited)

4. Highly visible clothing or safety vest (Minimum ANSI Class 1).

5. Protective eyewear that is ANSI Z87.1 approved (immediately available for use when required).

6. Leather work shoes, boots or other footwear that is certified as "safety footwear." (Hard sole shoes, no sneakers/tennis, open-toed shoes or shoes with high heels) The use of protective footwear (Steel or composite toe protective shoes or boots ANSI Z41.1 1991) when required.

Additional Requirements

Based on the factual circumstances and jobsite specific hazards, the following pieces of protective equipment should be worn:

1. Personal protective equipment must be used when an exposure warranting the equipment exists.

2. Personal protective equipment must be maintained in a clean and sanitary condition and in good working condition at all times.

3. All personal protective equipment that might be provided or supplied by an employee must be inspected by a supervisor and approved before the employee is allowed to wear the equipment.

4. All personal protective equipment must be inspected on a regular basis to ensure that it is in good working condition.

5. Personal protective equipment should never be altered from the original condition or used for purposes for which it was not intended.

6. Report any malfunctions or deficiencies in personal protective equipment to a supervisor immediately.

7. Know the uses and limitations of any personal protective equipment before using it.

8. Read the manufacturer's recommendations before using any personal protective equipment.

Hearing Protection

Purpose

The objective of the Company's Hearing Conservation Program is to protect employees from hearing loss caused by uncontrolled exposure to hazardous noise. The Company will reduce employee noise exposures and provide appropriate hearing protection where this noise cannot be controlled. The Company will also provide training and annual hearing tests to all persons working in areas or with equipment that have noise levels equal to or exceeding an eight-hour TWA sound limit of 85 dBA.

All employees are required to follow the minimum procedures outlined in this program. Any deviations from this program must be immediately brought to the attention of the employee's supervisor or the Company's President. A copy of OSHA's Occupational Noise Exposure Standard, 29 CFR 1910.95 will be made available for all employees.

Responsibility

The management of the Company is committed to the safety and health of its workers. The Company's Management will regularly communicate with employees about this program, use engineering and administrative controls to limit employee exposure; provide adequate hearing protection for employees; conduct hearing conservation training for new employees; and conduct annual hearing conservations training for all employees.

The Company's supervisors are responsible for notifying the Program Administrator if a change in the workplace results in higher noise exposure levels; ensuring that employees properly use and maintain their hearing protection; and ensuring employees comply with the requirements of this program.

All employees working in designated noise areas with noise exposures equal or exceeding the action level (85 dBA for an eight-hour shift, 84 for a nine-hour shift, 83 for a ten-hour shift, and 82 for a twelve-hour shift) will be included in the program. Employees are responsible for:

1. notifying their supervisor if a change in the workplace results in exposure to higher noise levels;

2. using noise control measures as required;

3. using approved, company-issued hearing protection in designated high noise areas;

4. requesting new hearing protection when needed;

5. exercising proper care of issued hearing protection;

6. attending all training and audiometric testing; and

7. notifying their supervisor of any complicating medical problems as soon as possible.

Monitoring Noise Exposure

Monitoring for noise exposure levels will be conducted by supervisors. Noise exposure monitoring will be conducted to:

1. determine whether hearing hazards exist;

2. determine whether noise presents a safety hazard by interfering with speech communication or recognition of audible warning signs;

3. identify employees for noise control efforts and establish hearing protection practices;

4. identify specific noise sources that require engineering and administrative controls; and

5. evaluate the success of noise control efforts.

It is the responsibility of the individual departments to notify the Company's President when there is a possible need for monitoring. Monitoring will be performed with the use of sound level meters, which determine the noise levels in the employee's hearing zone (near the ear), or with a personal dosimeter, which is a microphone that is usually attached near the collar to record noise levels through a shift. Employees will be allowed to observe or have a representative observe noise monitoring. The selection of monitoring will be performed at the discretion of the Company's President.

The result of the noise exposure monitoring will be recorded in a Noise Exposure Form provided by the Company. If the results of any monitoring are equal or exceed the action level (85 dBA TWA), the Program Administrator will:

1. notify in writing all employees working in areas at or above the action level;

2. provide appropriate hearing protection for exposed employees;

3. work with supervisors to ensure hearing protection is worn by employees at all times while in the noise area; and

4. investigate and implement feasible engineering and administrative controls to reduce the noise levels

Controlling Noise

The Company will use three methods for controlling employee exposure to noise: engineering controls, administrative controls, and hearing protection.

1. Engineering and Administrative Controls. The Company will first attempt to control existing noise hazards by implementing as many engineering controls as possible. Examples may include purchasing replacement equipment that produces less noise,

redesigning existing machinery to produce less noise, or building enclosures to lessen the noise exposure. If engineering controls are not feasible, then administrative controls will be examined. Examples may include reducing exposure through job rotations or extended breaks.

2. Hearing Protection. When engineering and administrative controls are not feasible or do not eliminate the hazardous noise, hearing protection will be required. In addition, management, supervisors, and employees shall properly wear the prescribed hearing protection while working or traveling through any area that is designated as a high noise area.

   Employees will be provided with an appropriate selection of hearing protection free of charge. The selection will include: Earplugs, foam earplugs, and earmuffs. The hearing protection must reduce noise exposure to a level below 85dBA TWA, will include various sizes and shapes, and will be appropriate for different working conditions.

Employee Training

Affected employees will be required to attend training on noise exposure within a month of hire and each year thereafter. The training will be conducted by a supervisor or a designated representative. Training topics will include:

1. effects of hazardous noise on hearing;
2. the purpose of hearing protection;
3. advantages and disadvantages of various types of hearing protection;
4. instructions on selecting, fitting, using, and caring for hearing protection;
5. the locations in the company where hearing protection is required;
6. explanation of audiograms and hearing testing;
7. company rules and procedures regarding hearing protection and use; and
8. review of OSHA's Occupational Nosie Exposure Standard.

Record Keeping

The Company will keep the following records for two years for the Hearing Conservation Program:

1. Noise Exposure Measurement Log for use when exposed to high noise
2. noise training documents
3. selected hearing protection and controls

RESPIRATORY PROTECTION PROGRAM

Purpose

This Company has implemented this policy to protect its employees from exposure to airborne hazards in excess of permissible exposure limits (PELs), or to oxygen-deficient atmospheres. The respiratory program administrator responsible for verifying engineering controls and work practices to protect workers from such hazards are rigorously enforced.

The respiratory program administrator or designee will be responsible for the periodic evaluation of the program. The evaluation will be based on results of an air quality-monitoring program, medical evaluations, changing work environment, equipment changes, work requirements and employee responses. All respiratory equipment will be NIOSH certified, and selections will be made based on identified and potential hazards, estimated exposures and contamination information.

Company Responsibilities

It is the responsibility of this Company to:

1. Prevent exposure to airborne hazards and when the hazards cannot be removed, to reduce them to the lowest achievable level through engineering and administrative controls before resorting to respirators

2. Protect workers against health effects of exposure to hazardous substances by requiring them to use respirators and appropriate equipment if they are, or may be, exposed to substances at levels above permissible exposure limits (PELs) as defined in OSHA 1910.1000 (tables Z-1 and Z-2). Companies must also check to see if their state OSHA has more stringent standards for specific hazardous substances

3. Establish and maintain a written respiratory protection program when necessary

4. Provide training and medical evaluations for the respiratory protection program at no cost to the employee

5. Evaluate workplace respiratory hazards, workplace and user factors to make respiratory protection equipment selections, providing suitable respirators

6. Select enough types of NIOSH-certified respirators appropriate to hazards so each user has an acceptable, correctly fitting choice

7. information about respirator safety when

8. medically cleared to use the respirator they use

9. Identify an appropriately licensed healthcare professional (PLHCP) to perform medical evaluations and provide a written recommendation regarding respirator use

10. Ensure follow-up medical examinations are provided for when required

11. Provide the PLHCP with the respiratory protection program and the OSHA regulations covering respiratory protection

12. Require fit testing for all employees who will wear a respirator and ensure the fit test is passed before they are permitted to use a respirator

13. Establish and implement procedures for use, maintenance and inspection of respirators Provide employees using atmosphere-supplying respirators with high purity breathing gases

14. Ensure filters, cartridges and canisters are labeled and color coded with NIOSH (the National Institute for Occupational Safety and Health) approval label

15. Evaluate the workplace to check that the program is being properly implemented and continues to protect against all hazards

16. Establish and retain all necessary documentation for the respirator program

Employee Responsibilities

Employees are expected to:

1. Participate in training

2. Follow the respiratory protection program

3. Use and care for respiratory protection devices appropriately

4. Report any problems or concerns about the respiratory protection program

5. Report any injuries, respiratory difficulties, or suspected hazardous atmospheres to appropriate supervisor

Safe Practices

Program Overview

If respirators are necessary to protect employee health, the Company must begin a written respiratory program specific to the hazards at the worksite. The program will include the following:

1. Procedures for selecting respirators

2. Medical evaluations of employees required to use respirators

3. Fit testing procedures for tight-fitting respirators

4. Procedures for proper use of respirators in routine, infrequent, and foreseeable emergency situations

5. Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding and otherwise maintaining respirators

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

7. Training of employees in the respiratory hazards to which they are potentially exposed during routine, infrequent, and emergency situations

8. Training of employees in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance

9. Procedures for regularly evaluating the effectiveness of the program

Voluntary Respirator Use

This Company may provide respirators to employees or allow employees to use their own respirators even if there are no conditions that require workers to be equipped with such devices.

However, employees who use respirators voluntarily must be medically able to use them safely. Such use of a respirator must not create its own hazards and workers who voluntarily use respirators must be provided with information on the conditions and requirements of respirator use.

Respirator Selection

The respiratory program administrator, with the help of the safety committee, will identify and evaluate the respiratory hazard(s) in the workplace; this evaluation will include a reasonable chemical state and physical form.

If the administrator cannot identify or reasonably estimate the employee exposure, the atmosphere will be treated as IDLH (atmospheres Immediately Dangerous to Life or Health). An appropriate respirator will be selected based on the respiratory hazard(s) to which the worker is exposed and the workplace and user factors that affect respirator performance and reliability. NIOSH-certified respirators will be selected from a sufficient number of respirator models and sizes so the respirator is acceptable to, and correctly fits, the user. The respirator will be used in compliance with the conditions of its certification.

Medical Evaluation

Using a respirator may place a physiological burden on employees that varies with the type of respirator worn, the job and workplace conditions in which the respirator is used, and the medical ability to use a respirator before the employee is fit tested or required to use the respirator in the workplace. Employee medical evaluations may be ended when the employee is no longer required to use a respirator.

Fit Testing

Before an employee may be required to use any respirator with a negative or positive pressure tight-fitting face-piece; the employee must be fit tested with the same make, model, style, and size of respirator that will be used.

This Company will:

1. Ensure that employees using a tight-fitting face-piece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT) as stated in this section

2. Ensure that an employee using a tight-fitting face-piece respirator is fit tested prior to initial use of the respirator, whenever a different respirator face-piece (size, style, model, or make) is used, and at least annually thereafter

3. Conduct an additional fit test whenever the employee reports, or the PLHCP, supervisor, or

4. condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight

5. Give an employee a reasonable opportunity to select a different respirator facepiece and be retested if after passing a QLFT or QNFT, the employee subsequently notifies the program administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable

The fit test will be administered using an OSHA-accepted QLFT or QNFT protocol. QLFT may only be used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less.

If the fit factor, as determined through an OSHA-accepted QNFT protocol, is equal to or greater than 100 for tight-fitting half face-pieces, or equal to or greater than 500 for tight-fitting full face-pieces, the QNFT has been passed with that respirator.

Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators will be accomplished by performing quantitative or qualitative fit testing in the negative pressure mode, regardless of the mode of operation (negative or positive pressure) that is used for respiratory protection.

Qualitative fit testing of these respirators will be accomplished by temporarily converting the respirator user's actual facepiece into a negative pressure respirator with appropriate filters or by using an identical negative pressure air-purifying respirator facepiece with the same sealing surfaces as a surrogate for the atmosphere-supplying or powered air-purifying respirator facepiece

Quantitative fit testing of these respirators will be accomplished by modifying the facepiece to allow sampling inside the facepiece in the breathing zone of the user, midway between the nose and mouth. This requirement will be accomplished by installing a permanent sampling

probe onto a surrogate facepiece, or by using a sampling adapter designed to temporarily provide a means of sampling air from inside the facepiece

Any modifications to the respirator facepiece for fit testing will be completely removed, and the facepiece restored to NIOSH-approved configuration, before that facepiece can be used in the workplace.

Respirator Use

No conditions are permitted that may result in face-piece seal leakage (facial hair). Employees must wear respirators in hazardous environments and practice continued effective respirator operation throughout the work shift.

Facepiece Seal Protection

Respirators with tight-fitting facepieces may not be worn by employees who have:

1. Facial hair that comes between the sealing surface of the facepiece and the face or that interferes with valve function

2. Any condition that interferes with the face-to-facepiece seal or valve function

If an employee wears corrective glasses or goggles or other personal protective equipment, they must be worn in a manner that does not interfere with the facepiece seal.

User Seal Check

Employees must perform a user seal check each time they put on the respirator using the following procedures, or any appropriate procedures designated to be used by the respirator's manufacturer. User seal checks are not substitutes for qualitative or quantitative fit tests.

Positive Pressure Check

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

Negative Pressure Check

Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the facepiece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the facepiece remains in its slightly

collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

Continuing Respirator Effectiveness

Appropriate surveillance will be maintained of work area conditions and degree of employee exposure or stress. When there is a change in work area conditions or degree of employee exposure or stress that may affect respirator effectiveness, this Company will reevaluate the continued effectiveness of the respirator.

Employees must leave the respirator use area:

1. To wash their faces and respirator face-pieces as necessary to prevent eye or skin irritation associated with respirator use

2. If they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the face-piece

3. To replace the respirator, filter, cartridge, or canister elements

If the employee detects vapor or gas breakthrough, changes in breathing resistance, or leakage of the face-piece, the employer must replace or repair the respirator before allowing the employee to return to the work area.

Maintenance and Care

Cleaning and Disinfecting

Each respirator user will be provided with a respirator that is clean, sanitary and in good working the appropriate procedures. The respirators will be cleaned and disinfected at the following intervals:

1. Respirators issued for the exclusive use of an individual employee will be cleaned and disinfected as often as necessary to be maintained in a sanitary condition

2. Respirators issued to more than one employee or maintained for emergency use will be cleaned and disinfected before being worn by different individuals

3. Respirators used in fit testing and training must be cleaned and disinfected after each use

Follow the manufacturer's procedures for cleaning and disinfecting respirators except where respirators are cleaned using manufacturer recommendations that are at least as effective. The Company will update and revise maintenance and care procedures as necessary to maintain compliance.

Storage

Respirators will be stored as follows:

1. All respirators will be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture and damaging chemicals, and will be packed or stored to prevent deformation of the facepiece and exhalation valve

2. In addition to proper storage procedures, emergency respirators will be:

    - Kept accessible to the work area
    - Stored in compartments or in covers that are clearly marked as containing emergency respirators
    - Stored in accordance with any applicable manufacturer instructions

Inspection

Respirators will be inspected as follows:

1. All respirators used in routine and infrequent situations must be inspected before each use and during cleaning

2. All respirators maintained for use in emergency situations will be inspected at least monthly according to the manufacturer's recommendations, and must be checked for proper function before and after each use

3. Emergency escape-only respirators will be inspected before being carried into the workplace for use

The Company will verify that respirator inspections include the following:

1. A check of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the facepiece, head straps, valves, connecting tube, and cartridges, canisters or filters

2. A check of elastomeric parts for pliability and signs of deterioration

Self-contained breathing apparatus must be properly inspected monthly. Air and oxygen cylinders will be maintained in a fully charged state and be recharged when the pressure falls to 90% of the manufacturer's recommended pressure level. The Company will determine that the regulator and warning devices function properly.

For respirators maintained for emergency use, this Company will:

1. Certify the respirator by documenting the date the inspection was performed, the name (or signature) of the person who made the inspection, the findings, required remedial action, and a serial number or other means of identifying the inspected respirator.

2. Provide this information on a tag or label attached to the storage compartment for the respirator, kept with the respirator, or included in inspection reports stored as paper or electronic files. This information must be maintained until replaced following a subsequent certification.

Repairs

Respirators that fail an inspection or are otherwise found to be defective will be removed from service, and be discarded, repaired or adjusted using the following procedures:

3. Repairs or adjustments to respirators will only be made by trained personnel using only the respirator manufacturer's NIOSH-approved parts.

4. Reducing and admission valves, regulators and alarms will be adjusted or repaired only by the manufacturer, or a technician trained by the manufacturer

5. Repairs must be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed.

Filters, Cartridges, and Canisters

All filters, cartridges and canisters used in the workplace will be labeled and color-coded with the NIOSH approval label. The label must not be removed and remain legible.

Program Evaluation and Recordkeeping

Workplace evaluations must ensure the respiratory protection program is being implemented and will consult employees to make sure they are using their respiratory protection devices properly.

Employees will be consulted to assess their views on the program and identify problems with the program including, but not limited to the following: respirator fit, respirator selection in regard to hazards, respirator use, and respirator maintenance.

The Company will establish and retain written information about medical evaluations, fit tests, and this respiratory program to facilitate employee involvement in the respirator program, to audit the adequacy of the program and to provide a record for OSHA.

A record of the qualitative and quantitative fit tests must include:

1. The name or identification of the employee tested

2. Type of fit test performed

3. Specific make, model, style, and size of respirator tested

4. Date of test

5. The pass/fail results for QLFTs or the fit factor and strip chart recording or other recording of the test results for QNFTs

Fit test records will be retained for respirator users until the next fit test is administered. All records of medical evaluations will be retained and made available.

Employees' medical records will be maintained for as long as the employee is employed plus thirty years (An exception may be made for employees who have worked for less than a year, provided the records were released to that employee upon termination. The Company will provide an employee or a designated representative access to a record on request or provide it in a reasonable time, place, and manner. If the record cannot be accessed within 15 working days, the requestor must be provided with a reason for the delay and the earliest date when the record will be available.

Training

This Company will ensure every employee is provided training on respiratory protection. This training will be provided at no cost to the employee during working hours.

The Company will use only training material that is appropriate in content and vocabulary to the educational level, literacy, and language of employees.

The Company will ensure that every employee will be trained in the following minimum elements before they use a respirator:

1. Proper respiratory protection selection

2. Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator

3. What the limitations and capabilities of the respirator are

4. How to wear and use the respirator effectively in emergency situations, including situations in which the respirator malfunctions

5. How to inspect, put on and remove, use, and fit check the seals of the respirator

6. What the procedures are for maintenance and storage of the respirator

7. How to recognize medical signs and symptoms that may limit or prevent the effective use of respirators

8. The general requirements of OSHA 1926.103 and 1910.134

Training records will include the following information:

1. Dates of the training sessions

2. Contents or a summary of the training sessions

3. Names and qualifications of persons conducting the training Names and job titles of all persons attending the training sessions

Employee training records will be retained for the length of their employment. Retraining will be done annually, and when any of the following situations occur:

1. Changes in the workplace or the type of respirator render previous training obsolete

2. Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill

3. Any other situation arises in which retraining appears necessary to ensure safe respirator use.

CONFINED SPACES SAFETY PROGRAM

Purpose

The purpose of the Company's Confined Space Program is to set procedures that will ensure workers safe entry into confined spaces and permit-required confined spaces to perform routine tasks associated with their employment. This procedure is designed to provide the minimum safety requirements in accordance with the Occupational Safety and Health Administration's (OSHA) Confined Space Standard, 1910.146.

Background

A confined space is defined as any location that has limited openings for entry and egress, is not intended for continuous employee occupancy, and is so enclosed that natural ventilation may not reduce air contaminants to levels below the threshold limit value (TLV). Examples of confined spaces include: manholes, stacks, pipes, storage tanks, trailers, tanker trucks, tank cars, pits, sumps, hoppers, and bins. Entry into confined spaces without proper precautions could result in injury, impairment, or death due to:

1. an atmosphere that is flammable or explosive;

2. lack of sufficient oxygen to support life;

3. contact with or inhalation of toxic materials; or

4. general safety or work area hazards such as steam or high-pressure materials.

Responsibilities

Company

In administering this Confined Space Program, Drake Industries will:

1. Monitor the effectiveness of the program.
2. Provide atmospheric testing and equipment as needed.
3. Provide personal protective equipment as needed.
4. Provide training to affected employees and supervisors.
5. Provide technical assistance as needed.
6. Preview and update the program on at least an annual basis or as needed.

Supervisors and Management Team

The Company's supervisors and management team will:

1. Ensure that a list of confined spaces at all Company worksites is maintained.
2. Ensure that canceled permits are reviewed for lessons learned.
3. Ensure training of personnel is conducted and documented.
4. Coordinate with outside responders.
5. Ensure that equipment is in compliance with standards.
6. Ensure that the responsible person in charge of confined space work shall:
    a. Ensure requirements for entry have been completed before entry is authorized.
    b. Ensure confined space monitoring is performed by personnel qualified and trained in confined space entry procedures.
    c. Ensure a list of monitoring equipment and personnel qualified to operate the equipment is maintained by the Safety and Occupational Health Office.
    d. Ensure that the rescue team has simulated a rescue in a confined space within the past twelve (12) months.
    e. Know the hazards that may be faced during entry, including the mode (how the contaminant gets into the body), signs or symptoms, and consequences of exposure.
    f. Fill out a permit.
    g. Determine the entry requirements.

h. Require a permit review and signature from the authorized Entry Supervisor.

i. Notify all involved employees of the permit requirements.

j. Post the permit in a conspicuous location near the job.

k. Renew the permit or have it reissued as needed (a new permit is required every shift).

l. Determine the number of Attendants required to perform the work.

m. Ensure all Attendant(s) know how to communicate with the entrants and how to obtain assistance.

n. Post any required barriers and signs.

o. Remain alert to changing conditions that might affect the conditions of the permits (i.e., require additional atmospheric monitoring or changes in personal protective equipment).

p. Change and reissue the permit, or issue a new permit as necessary.

q. Ensure periodic atmospheric monitoring is done according to permit requirements.

r. Ensure that personnel doing the work and all support personnel adhere to permit requirements.

s. Ensure the permit is canceled with the work is done.

t. Ensure the confined space is safely closed and all workers are cleared from the area.

Entry Supervisors

The Company will appoint a trained and authorized employee to serve as the Entry Supervisor(s) and such employee shall be qualified and authorized to approved confined space entry permits. The Entry Supervisor(s) shall be responsible for:

1. Determining if conditions are acceptable for entry.

2. Authorizing entry and overseeing entry operations.

3. Terminating entry procedures as required.

4. Serving as an Attendant, as long as the person is trained and equipped appropriately for that role.

5. Ensuring measures are in place to keep unauthorized personnel clear of the area.

6. Checking the work at least twice a shift to verify and document permit requirements are being observed (more frequent checks shall be made if operations or conditions are anticipated that could affect permit requirements).

7. Ensuring that necessary information on chemical hazards is kept at the worksite for the employees or rescue team.

8. Ensuring a rescue team is available and instructed in their rescue duties (i.e., an onsite team or a prearranged outside rescue service).

9. Ensuring the rescue team members have current certification in first aid and cardiopulmonary resuscitation (CPR).

Attendants

The Company will appoint a trained and authorized employee to serve as Attendant(s) and shall be stationed outside of the confined workspace. The Attendant(s) shall:

1. Be knowledgeable of and be able to recognize potential confined space hazards.

2. Maintain a sign-in/sign-out log with a count of all persons in the confined space, and ensure all entrants sign in and out.

3. Monitor surrounding activities to ensure the safety of personnel.

4. Maintain effective and continuous communication with personnel during confined space entry, work, and exit.

5. Order personnel to evacuate the confined space if he/she:

    a. observes a condition which is not allowed on the entry permit;

    b. notices the entrants acting strangely, possibly as a result of exposure to hazardous substances;

    c. notices a situation outside the confined space which could endanger personnel;

    d. notices a hazard within the confined space that has not been previously recognized or taken into consideration;

    e. must leave his/her work station; or

    f. must focus attention on the rescue of personnel in some other confined space that he/she is monitoring.

6. Immediately summon the Rescue Team if crew rescue becomes necessary.

7. Keep unauthorized persons out of the confined space, order them out, or notify authorized personnel of an unauthorized entry.

Entrants and Affected Employees

Employees who are granted permission to enter a confined space shall:

1. Read and observe the entry permit requirements.
2. Remain alert to the hazards that could be encountered while in the confined space.
3. Properly use the personal protective equipment that is required by the permit.
4. Immediately exit the confined space when:
    a. they are ordered to do so by an authorized person;
    b. they notice or recognize signs or symptoms of exposure;
    c. a prohibited condition exists; or
    d. the automatic alarm system sounds.
5. Alert Attendant(s) when a prohibited condition exists and/or when warning signs or symptoms of exposure exist.

Training

Drake Industries shall provide training so that all employees whose work is regulated by this Confined Space Program acquire the understanding, knowledge, and skills necessary for the safe performance of their duties in confined spaces.

Frequency

The Company President or a Company Supervisor shall provide training to each affected employee:

1. before the employee is first assigned duties within a confined space;
2. before there is a change in assigned duties;
3. when there is a change in permit space operations that presents a hazard for which an employee has not been trained; and
4. when Drake Industries has reason to believe that there are deviations from the confined space entry procedures required in this program, or that there are inadequacies in the employee's knowledge or use of these procedures.

The training shall establish employee proficiency in the duties required in this program, and shall introduce new or revised procedures, as necessary, for compliance with this program.

General Training

All employees who will enter confined spaces shall be trained in entry procedures. Personnel responsible for supervising, planning, entering, or participating in confined space entry and rescue shall be adequately trained in their functional duties prior to any confined space entry. Training shall include:

1. Explanation of the general hazards associated with confined spaces.

2. Discussion of specific confined space hazards associated with the facility, location, or operation.

3. Reason for, proper use, and limitations of personal protective equipment and other safety equipment required for entry into confined spaces.

4. Explanation of permits and other procedural requirements for conducting a confined space entry.

5. A clear understanding of what conditions would prohibit entry.

6. Procedures for responding to emergencies.

7. Duties and responsibilities of the confined space entry team.

8. Description of how to recognize symptoms of overexposure to probable air contaminants in themselves and co-workers, and method(s) for alerting the Attendant(s).

Refresher training shall be conducted as needed to maintain employee competence in entry procedures and precautions.

Specific Training

1. Training for atmospheric monitoring personnel shall include proper use of monitoring instruments, including instruction on the following:

    a. proper use of the equipment;

    b. calibration of equipment;

    c. sampling strategies and techniques; and

    d. exposure limits (PELs, TLVs, LELs, UELs, etc.).

2. Training for Attendants shall include the following:

a. procedures for summoning rescue or other emergency services; and

b. proper utilization of equipment used for communicating with entry and emergency/rescue personnel.

3. Training for Emergency Response Personnel shall include:

a. rescue plan and procedures developed for each type of confined space that is anticipated to be encountered;

b. use of emergency rescue equipment;

c. first aid and CPR techniques; and

d. work location and confined space configuration to minimize response time.

Verification of Training

Periodic assessment of the effectiveness of employee training shall be conducted by the Company President or a Company Supervisor. Training sessions shall be repeated as often as necessary to maintain an acceptable level of personnel competence.

Identification of Hazards and Evaluations of Confined Spaces

Survey

The Company will appoint a Responsible Person that is authorized and trained to ensure a survey of the worksite is conducted to identify confined spaces. This survey can be partially completed from initial and continuing site characterizations, as well as other available data (i.e., blueprints and job safety analyses). The purpose of the survey is to develop an inventory of those locations and/or equipment at Drake Industries that meet the definition of a confined space. This information shall be communicated to personnel, and appropriate confined space procedures shall be followed prior to entry. The initial surveys shall include air monitoring to determine the air quality in the confined spaces. The potential for the following situations shall be evaluated by the Responsible Person:

1. flammable or explosive potential;

2. oxygen deficiency; and

3. presence of toxic and corrosive material.

Hazard Reevaluation

The Responsible Person shall identify and reevaluate hazards based on possible changes in activities or other physical or environmental conditions that could adversely affect work. A master inventory of confined spaces shall be maintained. Any change in designation of a confined space will be routed to all affected personnel by Responsible Person.

Pre-Entry Hazard Assessment

A hazard assessment shall be completed by Responsible Person(s) prior to any entry into a confined space. The hazard assessment should identify:

1. the sequence of work to be performed in the confined space;

2. the specific hazards known or anticipated; and

3. the control measures to be implemented to eliminate or reduce each of the hazards to an acceptable level.

No entry shall be permitted until the hazard assessment has been reviewed and discussed by all persons engaged in the activity. Personnel who are to enter confined spaces shall be informed of known or potential hazards associated with said confined spaces.

Hazard Controls

Hazard controls shall be instituted to address changes in the work processes and/or working environment. Hazard controls must be able to either control the health hazards by eliminating the responsible agents, reduce health hazards below harmful levels, or prevent the contaminants from coming into contact with the workers.

The following order of precedence shall be followed in reducing confined space risks.

1. Engineering Controls.

   Engineering controls are those controls that eliminate or reduce the hazard through implementation of sound engineering practices.

   Ventilation is one of the most common engineering controls used in confined spaces. When ventilation is used to remove atmospheric contaminants from a confined space, the space shall be ventilated until the atmosphere is within the acceptable ranges. Ventilation shall be maintained during the occupancy if there is a potential for the atmospheric conditions to move out of the acceptable range. When ventilation is not possible or feasible, alternate protective measures or methods to remove air contaminants and protect occupants shall be determined by Responsible Person prior to authorizing entry.

   When conditions necessitate and can accommodate continuous forced air ventilation, the following precautions shall be followed:

   a. Employees shall not enter the space until the forced air ventilation has eliminated any hazardous atmosphere.

   b. Forced air ventilation shall be directed so as to ventilate the immediate areas where an employee is or will be present within the space.

c. Continuous ventilation shall be maintained until all employees have left the space.

d. Air supply or forced air ventilation shall originate from a clean source.

2. Work Practice (Administrative) Controls.

   Work practice (administrative) controls are those controls which eliminate or reduce the hazard through changes in the work practices (i.e., rotating workers, reducing the amount of worker exposure, and housekeeping).

3. Personal Protective Equipment (PPE).

   If the hazard cannot be eliminated or reduced to a safe level through engineering and/or work practice controls, PPE should be used. Responsible Person(s) shall determine the appropriate PPE needed by all personnel entering the confined space, including rescue teams. PPE that meets the specifications of applicable standards shall be selected in accordance with the requirements of the job to be performed.

Entry Permits

The Confined Space Entry Permit is the most essential tool for assuring safety during entry in confined spaces with known hazards, or with unknown or potentially hazardous atmospheres. The entry permit process guides the supervisor and workers through a systematic evaluation of the space to be entered. The permit should be used to establish appropriate conditions. Before each entry into a confined space, an entry permit will be completed by Responsible Person. The Responsible Person will then communicate the contents of the permit to all employees involved in the operation, and post the permit conspicuously near the work location. A standard entry permit shall be used for all entries.

Key Elements of Entry Permits

A standard entry permit shall contain the following items:

1. Space to be entered.

2. Purpose of entry.

3. Date and authorized duration of the entry permit.

4. Name of authorized entrants within the permit space.

5. Means of identifying authorized entrants inside the permit space (i.e., rosters or tracking systems).

6. Name(s) of personnel serving as Attendant(s) for the permit duration.

7. Name of individual serving as Entry Supervisor, with a space for the signature or initials of the Entry Supervisor who originally authorized the entry.

8. Hazards of the permit space to be entered.

9. Measures used to isolate the permit space and to eliminate or control permit space hazards before entry (i.e., lockout/tagout of equipment and procedures for purging, ventilating, and flushing permit spaces).

10. Acceptable entry conditions.

11. Results of initial and periodic tests performed, accompanied by the names or initials of the testers and the date(s) when the tests were performed.

12. Rescue and emergency services that can be summoned, and the means of contacting those services (i.e., equipment to use, phone numbers to call).

13. Communication procedures used by authorized entrants and Attendant(s) to maintain contact during the entry.

14. Equipment to be provided for compliance with this Confined Space Program (i.e., PPE, testing, communications, alarm systems, and rescue).

15. Other information necessary for the circumstances of the particular confined space that will help ensure employee safety.

16. Additional permits, such as for hot work, that have been issued to authorize work on the permit space.

Permit Scope and Duration

A permit is only valid for one shift. For a permit to be renewed, the following conditions shall be met before each reentry into the confined space:

1. Atmospheric testing shall be conducted, and the results should be within acceptable limits. If atmospheric test results are not within acceptable limits, precautions to protect entrants against the hazards should be addressed on the permit and should be in place.

2. Responsible Person shall verify that all precautions and other measures called for on the permit are still in effect.

3. Only operations or work originally approved on the permit shall be conducted in the confined space.

A new permit shall be issued, or the original permit will be reissued if possible, whenever changing work conditions or work activities introduce new hazards into the confined space. Responsible Person shall retain each canceled entry permit for at least one (1) year to facilitate the review of the Confined Space Entry Program. Any problems encountered during an entry operation

shall be noted on the respective permit(s) so that appropriate revisions to the confined space permit program can be made.

Entry Procedures

When entry into a confined space is necessary, either the Entry Supervisor or Responsible Person may initiate entry procedures, including the completion of a confined space entry permit. Entry into a confined space shall follow the standard entry procedure below.

Prior to Entry

The entire confined space entry permit shall be completed before a standard entry. Entry shall be allowed only when all requirements of the permit are met and it is reviewed and signed by an Entry Supervisor. The following conditions must be met prior to standard entry:

1. Affected personnel shall be trained to establish proficiency in the duties that will be performed within the confined space.

2. The internal atmosphere within the confined space shall be tested by Responsible Person with a calibrated, direct-reading instrument.

3. Personnel shall be provided with necessary PPE as determined by the Entry Supervisor.

    a. Atmospheric monitoring shall take place during the entry. If a hazardous atmosphere is detected during entry:

    b. personnel within the confined space shall be evacuated by the Attendant(s) or Entry Supervisor until the space can be evaluated by Responsible Person to determine how the hazardous atmosphere developed; and

    c. controls shall be put in place to protect employees before reentry.

Opening a Confined Space

Any conditions making it unsafe to remove an entrance cover shall be eliminated before the cover is removed. When entrance covers are removed, the opening shall be promptly guarded by a railing, temporary cover, or other temporary barrier that will prevent anyone from falling through the opening. This barrier or cover shall protect each employee working in the space from foreign objects entering the space. If it is in a traffic area, adequate barriers shall be erected.

Atmospheric Testing

Atmospheric test data is required prior to entry into a confined space. Atmospheric testing is required for two distinct purposes: (1) evaluation of the hazards of the permit space, and (2) verification that acceptable conditions exist for entry into that space. If a person must go into the space to obtain the needed data, then Standard Confined Space Entry Procedures shall be followed. Before entry into a confined space, Responsible Person shall conduct testing for hazardous

atmospheres. The internal atmosphere shall be tested with a calibrated, direct-reading instrument for oxygen, flammable gases and vapors, and potential toxic air contaminants, in that order.

Testing equipment used in specialty areas shall be listed or approved for use in such areas by Responsible Person. All testing equipment shall be approved by a nationally recognized laboratory, such as Underwriters Laboratories or Factory Mutual Systems.

1. Evaluation Testing

   The atmosphere of a confined space should be analyzed using equipment of sufficient sensitivity and specificity. The analysis shall identify and evaluate any hazardous atmospheres that may exist or arise, so that appropriate permit entry procedures can be developed and acceptable entry conditions stipulated for that space. Evaluation and interpretation of these data and development of the entry procedure should involve a technically qualified professional (i.e., consultant, certified industrial hygienist, registered safety engineer, or certified safety professional).

2. Verification Testing

   A confined space that may contain a hazardous atmosphere shall be tested for residues of all identified or suspected contaminants. The evaluation testing should be conducted with specified equipment to determine that residual concentrations at the time or testing and entry are within acceptable limits. Results of testing shall be recorded by the person performing the tests on the permit. The atmosphere shall be periodically retested (frequency to be determined by Responsible Person) to verify that atmospheric conditions remain within acceptable entry parameters.

3. Acceptable Limits

   The atmosphere of the confined spaces shall be considered to be within acceptable limits when the following conditions are maintained:

   a. oxygen: 19.5 percent to 23.5 percent;

   b. flammability: less than 10 percent of the Lower Flammable Limit (LFL); and

   c. toxicity: less than recognized American Conference of Governmental Industrial Hygienists (ACGIH) exposure limits or other published exposure levels [i.e., OSHA Permissible Exposure Limits (PELs) or National Institute of Occupational Safety and Health (NIOSH) Recommended Exposure Limits (RELs)].

Isolation and Lockout/Tagout Safeguards

All energy sources that are potentially hazardous to confined space entrants shall be secured, relieved, disconnected, and/or restrained before personnel are permitted to enter the confined space. Equipment systems or processes shall be locked out and/or tagged out as required

by the Drake Industries Lockout/Tagout Program [which complies with OSHA's 29 CFR 1910-147 and American National Standards Institute (ANSI) Z244.1-1982, Lockout/Tagout of Energy Sources] prior to permitting entry into the confined space. In confined spaces where complete isolation is not possible, Responsible Person shall evaluate the situation and make provisions for as rigorous an isolation as practical. Special precautions shall be taken when entering double-walled, jacketed, or internally insulated confined spaces that may discharge hazardous material through the vessel's internal wall.

Where there is a need to test, position, or activate equipment by temporarily removing the lock or tag or both, a procedure shall be developed and implemented to control hazards to the occupants. Any removal of locks, tags, or other protective measures shall be done in accordance with the Drake Industries Lockout/Tagout Program.

Ingress/Egress Safeguards

Means for safe entry and exit shall be provided for confined spaces. Each entry and exit points shall be evaluated by Responsible Person to determine the most effective methods and equipment that will enable employees to safely enter and exit the confined space.

Appropriate retrieval equipment or methods shall be used whenever a person enters a confined space. Use of retrieval equipment may be waived by the Responsible Person(s) if use of the equipment increases the overall risks of entry or does not contribute to the rescue. A mechanical device shall be available to retrieve personnel from vertical confined spaces greater than five (5) feet in depth.

Warning Signs and Symbols

All confined spaces that could be inadvertently entered shall have signs identifying them as confined spaces. Signs shall be maintained in a legible condition. The signs shall contain a warning that a permit is required before entry. Accesses to all confined spaces shall be prominently marked.

Emergency Response

Emergency Response Plan

Responsible Person shall maintain a written plan of action that has provisions for conducting a timely rescue of individuals within a confined space, should an emergency arise. The written plan shall be kept onsite where the confined space work is being conducted. All affected personnel shall be trained on the Emergency Response Plan.

Retrieval Systems and Methods of Non-Entry Rescue

Retrieval systems shall be available and ready when an authorized person enters a permit space, unless such equipment increases the overall risk of entry, or the equipment would not contribute to the rescue of the entrant. Retrieval systems shall have a chest or full-body harness and a retrieval line attached at the center of the back near shoulder level or above the head. If

harnesses are not feasible, or would create a greater hazard, wristlets may be used in lieu of the harness. The retrieval line shall be firmly fastened outside the space so that rescue can begin as soon as anyone is aware that retrieval is necessary. A mechanical device shall be available to retrieve personnel from vertical confined spaces more than five (5) feet deep.

WRITTEN TOOL SAFEY PROGRAM

Purpose

The use of hand and power tools makes many tasks easier for the workers at the Company. However, the same tools that assist us, if improperly used or maintained, can create significant hazards in the work area.

Employees who use tools must be properly trained to use, adjust, store and maintain tools properly. This program covers hand, electrical, pneumatic, powder driven, and hydraulic tool safety. The use of many tools can create dust, flying debris, noise and other hazards, so appropriate personal protective equipment (PPE) should always be used. The Company's Personal Protective Equipment, Respiratory Protection and Hearing Conservation Written Programs contain detailed information about the proper selection, use and care of PPE.

General Safety Precautions

Most hazards involved in the use of tools can be prevented by following five basic safety rules:

1. Keep all tools in good condition with regular maintenance.
2. Use the right tool for the job.
3. Examine each tool for damage before use and do not use if damaged.
4. Operate according to the manufacturer's instructions.
5. Use the proper personal protective equipment.

Hand Tools

Hand tools are non-powered and act as an extension of the hand. They include anything from axes to wrenches. About 6% of all compensated work injuries result from the use of hand tools. The greatest hazards from hand tools result from use of the wrong tool, improper use of the right tool, lack of appropriate personal protective equipment and lack of tool maintenance. Injuries may range from bruises and puncture wounds to broken bones, contusions or severed fingers.

Lots, yards, and other work areas should be kept as clean and dry as possible to prevent accidental slips or trips with or around dangerous hand tools. Around flammable substances, sparks produced by iron and steel hand tools can be a dangerous ignition source. Where this hazard exists, spark-resistant tools made from brass, plastic, aluminum or wood are safer to use. It is also important not to use screwdrivers, pliers or other hand tools around energized electrical circuits unless they are properly insulated.

Inspection

All hand tools must be inspected on a regular basis. This includes personal tools that some workers may bring to the job. If personal tools are found to be defective, the worker should get new tools. The primary function of regular tool inspections is to assure that there are enough safe tools on hand to do the job. Defective tools must be tagged, repaired or replaced. They must never be used.

The foreman is responsible for ensuring that the tools used on the job are in good condition and that all tools necessary to do the job safely are available on the site. The worker's prime responsibility is to use tools in such a way that no one gets hurt. This includes knowing the rules governing the use of tools, following those rules while using tools and exercising common sense.

Prior to using a hand tool, a worker should be familiar with its proper applications, its limitations and the hazards involved in its use. The tool should be inspected and replaced or repaired at once if found to be defective. The work area should be checked to determine the location of electrical wires, air hoses or any other potential hazards so that they can be removed, guarded or avoided. Personal protective devices must be in place when they are required. When the worker has made sure that his footing is secure and that he has alerted all other workers, who may be endangered by his activities, he is ready to safely use the hand tool.

Safety Tips for Hand Tool Users

General Hand Tool Safety

Always keep your tools clean. Oil can cause a tool to slip off an object or out of your hands. Dirt and grime can impair the movement of the tool, requiring more pressure. This can lead to injury. Never use an un-insulated hand tool for electrical work. Finally, carry tools in a toolbox or tool belt. Tools, especially those with sharp points or edges, carried in pockets can puncture the skin, cause bruises and get entangled in machinery.

Hand Tool Rules

1. Know the purpose of each tool in your toolbox, and use each for the specific task it was designed to do.
2. Never use any tool unless you are trained to do so.
3. Inspect tools before each use and replace or repair if worn or damaged.
4. Clean tools after every use.
5. Keep cutting edges sharp.
6. Never test a cutting edge with your fingers--test on scrap material instead.
7. Select the right size tool for the job--don't use cheaters.

8. When working on ladders or scaffolding, be sure that you and your tools are secure. (A falling tool can seriously injure a coworker or bystander.)

9. Carry tools correctly--never put sharp or pointed tools in your pockets.

10. When hand-carrying tools, point cutting edges away from you, toward the ground.

11. Lightly oil metal tools and store in clean, dry place to prevent rust.

12. Wear Personal Protective Equipment (PPE), such as safety goggles, face shields, gloves, etc. as required.

Power Tool Precautions

Power tools can be hazardous when improperly used. There are several types of power tools, based on the power source they use: electric, pneumatic, liquid fuel, hydraulic and powder-actuated. The following general precautions should be observed by power tool users:

1. Never carry a tool by the cord or hose.

2. Never yank the cord or the hose to disconnect it from the receptacle.

3. Keep cords and hoses away from heat, oil, and sharp edges.

4. Disconnect tools when not in use, before servicing, and when changing accessories such as blades, bits and cutters.

5. All observers should be kept at a safe distance away from the work area.

6. Secure work with clamps or a vise, freeing both hands to operate the tool.

7. Avoid accidental starting. The worker should not hold a finger on the switch button while carrying a plugged-in tool.

8. Tools should be maintained with care. They should be kept sharp and clean for the best performance. Follow instructions in the user's manual for lubricating and changing accessories.

9. Be sure to keep good footing and maintain good balance.

10. The proper apparel should be worn. Loose clothing, ties or jewelry can become caught in moving parts.

11. All portable electric tools that are damaged shall be removed from use and tagged "Do Not Use."

Guards

Hazardous moving parts of a power tool need to be safeguarded. For example, belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating or moving parts of equipment must be guarded. Guards, as necessary, should be provided to protect the operator and others from the following:

1. Point of operation
2. In-running nip points
3. Rotating parts
4. Flying chips and sparks.

Safety guards must never be removed when a tool is being used. For example, portable circular saws must be equipped with guards. An upper guard must cover the entire blade of the saw. A retractable lower guard must cover the teeth of the saw, except when it makes contact with the work material. The lower guard must automatically return to the covering position when the tool is withdrawn from the work.

Safety Switches

The following hand-held powered tools are to be equipped with a momentary contact "on-off" control switch: drills, tappers, fastener drivers, horizontal, vertical and angle grinders with wheels larger than 2 inches in diameter, disc and belt sanders, reciprocating saws, saber saws and other similar tools. These tools also may be equipped with a lock-on control provided that turn off can be accomplished by a single motion of the same finger or fingers that turn it on.

The following hand-held powered tools may be equipped with only a positive "on-off" control switch: platen sanders, disc sanders with discs 2 inches or less in diameter; grinders with wheels 2 inches or less in diameter; routers, planers, laminate trimmers, nibblers, shears, scroll saws and jigsaws with blade shanks ¼-inch wide or less.

Other hand-held powered tools such as circular saws having a blade diameter greater than 2 inches, chain saws and percussion tools without positive accessory holding means must be equipped with a constant pressure switch that will shut off the power when the pressure is released.

Electrical Safety

Among the chief hazards of electric-powered tools are burns and slight shocks that can lead to injuries or even heart failure. Under certain conditions, even a small amount of current can result in severe injury and eventual death. A shock also can cause the user to fall off a ladder or other elevated work surface.

To protect the user from shock, tools must either have a three-wire cord with ground and be grounded, be double insulated or be powered by a low-voltage isolation transformer. Three-

wire cords contain two current-carrying conductors and a grounding conductor. One end of the grounding conductor connects to the tool's metal housing.

The other end is grounded through a prong on the plug. Any time an adapter is used to accommodate a two-hole receptacle, the adapter wire must be attached to a known ground. The third prong should never be removed from the plug.

Double insulation is more convenient. The user and the tools are protected in two ways: by normal insulation on the wires inside and by a housing that cannot conduct electricity to the operator in the event of a malfunction.

Electric Power Tool General Safety Practices

1. Electric tools should be operated within their design limitations.
2. Gloves and safety footwear are recommended during use of electric tools.
3. When not in use, tools should be stored in a dry place.
4. Electric tools should not be used in damp or wet locations.
5. Work areas should be well lighted.

Powered Abrasive Wheel Tools

Generally

Powered abrasive grinding, cutting, polishing, and wire buffing wheels create special safety problems because they may throw off flying fragments.

Before an abrasive wheel is mounted, it should be inspected closely and sound- or ring-tested to be sure that it is free from cracks or defects. To test, wheels should be tapped gently with a light non-metallic instrument. If they sound cracked or dead, they could fly apart in operation and so must not be used. A sound and undamaged wheel will give a clear metallic tone or "ring."

To prevent the wheel from cracking, the user should be sure it fits freely on the spindle. The spindle nut must be tightened enough to hold the wheel in place, without distorting the flange. Follow the manufacturer's recommendations. Care must be taken to assure that the spindle wheel will not exceed the abrasive wheel specifications.

Due to the possibility of a wheel disintegrating (exploding) during start-up, the employee should never stand directly in front of the wheel as it accelerates to full operating speed. Portable grinding tools need to be equipped with safety guards to protect workers not only from the moving wheel surface, but also from flying fragments in case of breakage.

Powered Grinder Safety Precautions

1. Always use eye protection.

2. Turn off the power when not in use.

3. Never clamp a hand-held grinder in a vise.

Pneumatic Tools

Pneumatic tools are powered by compressed air and include chippers, drills, hammers, and sanders. There are several dangers encountered in the use of pneumatic tools. The main one is the danger of getting hit by one of the tool's attachments or by some kind of fastener the worker is using with the tool.

Eye protection is required and *face protection* is recommended for employees working with pneumatic tools. Working with noisy tools such as jackhammers requires proper, effective use of *hearing protection*, and, when dust is generated, respiratory protection. Detailed information about hearing and respiratory protection is available in this handbook and should be consulted prior to using pneumatic tools.

When using pneumatic tools, employees must check to see that the tools are fastened securely to the hose to prevent them from becoming disconnected. A short wire or positive locking device attaching the air hose to the tool will serve as an added safeguard.

A safety clip or retainer must be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel. Nail guns must have a safety spring installed to prevent accidental firing unless pressed against the surface to be nailed. Compressed air guns should never be pointed toward anyone. Users should never "dead-end" them against themselves or anyone else.

Powder-Actuated Tools

Generally

Powder-actuated tools operate like a loaded gun and should be treated with the same respect and precautions. In fact, they are so dangerous that only specially trained employees should operate them.

Safety Precautions

The following precautions should always be taken when dealing with powder-actuated tools:

1. These tools should not be used in an explosive or flammable atmosphere.

2. Before using the tool, the worker should inspect it to determine that it is clean, that all moving parts operate freely and that the barrel is free from obstructions.

3. The tool should never be pointed at anybody.

4. The tool should not be loaded unless it is to be used immediately. A loaded tool should not be left unattended, especially where it would be available to unauthorized persons.

5. Hands should be kept clear of the barrel end. To prevent the tool from firing accidentally, two separate motions are required for firing: one to bring the tool into position and another to pull the trigger. The tool must not be able to operate until it is pressed against the work surface with a force of at least 5 pounds greater than the total weight of the tool.

6. If a powder-actuated tool misfires, the employee should wait at least 30 seconds, then try firing it again. If it still will not fire, the user should wait another 30 seconds so that the faulty cartridge is less likely to explode, then carefully remove the load. The bad cartridge should be put in water.

7. Suitable eye and face protection are essential when using a powder-actuated tool.

8. The muzzle end of the tool must have a protective shield or guard centered perpendicularly on the barrel to confine any flying fragments or particles that might otherwise create a hazard when the tool is fired. The tool must be designed so that it will not fire unless it has this kind of safety device.

All powder-actuated tools must be designed for varying powder charges so that the user can select a powder level necessary to do the work without excessive force. If the tool develops a defect during use, it should be tagged and taken out of service immediately until it is properly repaired.

Powder-Actuated Tool Fasteners

When using powder-actuated tools to apply fasteners, there are some precautions to consider. Fasteners must not be fired into material that would let them pass through to the other side. The fastener must not be driven into materials like brick or concrete any closer than 3 inches to an edge or corner. In steel, the fastener must not come any closer than one-half inch from a corner or edge. Fasteners must not be driven into very hard or brittle materials that might chip or splatter or make the fastener ricochet.

An alignment guide must be used when shooting a fastener into an existing hole. A fastener must not be driven into a spalled area caused by an unsatisfactory fastenings

Hydraulic Power Tools

Generally

The fluid used in hydraulic power tools must be an approved fire-resistant fluid and must retain its operating characteristics at the most extreme temperatures to which it will be exposed. The manufacturer's recommended safe operating pressure for hoses, valves, pipes, filters and other fittings must not be exceeded.

Jacks

All jacks must have a device that stops them from jacking up too high and the manufacturer's load limit must be permanently marked in a prominent place on the jack and should not be exceeded. A jack should never be used to support a lifted load. Once the load has been lifted, it must immediately be blocked up.

Use wooden blocking under the base if necessary to make the jack level and secure. If the lift surface is metal, place a 1-inch-thick hardwood block or equivalent between it and the metal jack head to reduce the danger of slippage.

To set up a jack, make certain of the following:

1. the base rests on a firm level surface,
2. the jack is correctly centered,
3. the jack head bears against a level surface, and
4. the lift force is applied evenly.

Proper maintenance of jacks is essential for safety. All jacks must be inspected before each use and lubricated regularly. If a jack is subjected to an abnormal load or shock, it should be thoroughly examined to make sure it has not been damaged. If freezing temperatures are possible any Hydraulic jack that is or may be exposed to freezing temperatures must be filled with an adequate antifreeze liquid.

General Tool Safety Guidelines

1. All manufacturer recommendations and instructions must be followed for each particular tool. (Consult the user's manual.)
1. Only qualified workers will be allowed to use or operate power tools.
2. All tools must be maintained in safe operating condition including employee- o w ne d tools. Tools and accessories will be kept clean and sharp for best performance.
3. Maintenance or adjustment of tools, while the tool or any part of the tool is in motion or operation is prohibited.
4. Tools and equipment must be routinely inspected to ensure that they are maintained in safe working condition.
5. Tools that are found to be defective must be removed from service until repaired or replaced. Tools removed from service should be tagged or otherwise labeled to be kept out of service.

6. Eye protection is required when using hand or power tools when flying particles are a hazard to eyes. Tools are to be used only for the purpose for which they are intended.

7. Use the proper tool, considering the size and type appropriate for the job.

8. Do not use worn or damaged tools. Do not use tools with cracked, broken or loose heads.

9. Do not operate tools beyond their rated limits, or try to increase their capacity with by-passes, cheaters or other modifications.

10. Do not use hoses or electric cords for hoisting or lowering tools or other materials. Never pull the cord to disconnect it from the receptacle, instead pull the receptacle.

11. Be sure that safety guards are in working order and in place before operating any power tool. All electric tools must be grounded or protected by a manufactured system of double insulation.

12. Do not use electrical tools with frayed or damaged supply cords. Keep all cords away from heat, oil and sharp objects and water.

13. Keep moving parts of power tools pointed away from your body and others. Do not hold a finger on the switch button while carrying a plugged-in tool.

14. Do not operate electrical tools while standing on damp or wet surfaces.

15. Take special precautions when using power tools on a scaffold, ladder or other locations that restrict movements.

16. Be sure that a power tool is off, and all motion has stopped before setting the tool down.

17. Disconnect the tool from the power source before changing drills, blades or bits or attempting repair or adjustment. Never leave a running tool unattended.

18. Do not operate an explosive powder-actuated tool unless you have been trained and are certified to do so. Never point a powder-actuated tool at anybody.

19. Do not load a powder-actuated tool unless it will be used immediately. Never leave a loaded tool unattended.

20. Tool cutting edges must be kept sharp and true so that the tool moves smoothly with no binding or slipping.

21. Tool handles must be wedged tightly to the head of tools.

22. Do not throw tools around the job site. It could cause damage and may injure other workers.

23. Chains, jacks, slings, come-alongs and related equipment must be inspected prior to use, and replaced if damaged or worn.

24. Keep tools stored in neat dry areas to prevent damage or excessive wear.

25. Always follow manufacturer recommendations when disposing of misfired loads. Always follow manufacturer recommendations when using power actuated tools.

DRAKE INDUSTRIES
Reclamation & Environmental Services

SECTION III

GENERAL SAFETY POLICIES AND PRACTICES

GENERAL SAFETY RULES AND WORK PRACTICES AND GUIDELINES

Below are general safety rules and good work practices to be followed on every job site. The work practices, guidelines, and reminders provided below shall be used in conjunction and addition to the foregoing written safety programs.

1. The safety of employees and all workers always comes first.

2. Employees will never be expected to perform duties, tasks that put themselves or others at risk.

3. Employees and other workers must report any and all injuries and illnesses, damage to machinery or equipment, near miss incidents, identified hazards and unsafe conditions in the workplace to a supervisor immediately.

4. Employees are required to participate in all training. Employees will be expected to retain at least minimal safety related information and demonstrate on an ongoing basis that they can perform their job assignments safely and without risk to themselves or others.

5. Employees are required and expected to follow and adhere to all safety-related rules and regulations while on the premises of this company and when performing duties or acting on behalf of this Company.

6. Never attempt to operate tools or equipment that you have not been specifically authorized and instructed to use. Never operate machinery or equipment without a thorough knowledge or understanding of operating and safety procedures.

7. Never attempt to make unauthorized repairs or perform unauthorized service or maintenance on any machinery, equipment, or facilities. All equipment or machinery in need of repair must be reported to a supervisor immediately.

8. Always utilize protective equipment as required or instructed.

9. Adequate clothing must be worn at all times. Employees must be fully dressed in the workplace at all times.

10. Keep your work area and the entire workplace as clean as possible.

11. Never run in the workplace for any reason, even during emergency procedures or evacuation.

12. Be always constantly aware of your surroundings and the work in progress.

13. Plan your work, especially unfamiliar tasks, prior to performing it to ensure that any unsuspected safety hazards are considered.

14. Employees must never put themselves or other workers at risk.

15. Shortcuts through various work areas are not allowed. Always use the prescribed passageways.

16. Horseplay is not allowed in any form or fashion.

17. Never remove material that is being used for accident prevention or a safety barrier, such as machine guards, flagged areas or barricades.

18. Read and become familiar with the elements of the safety policies, practices, and procedures of the Company and the general contractor (if applicable).

19. Do not touch or talk to an employee operating a machine or power tool.

20. Work boots and other appropriate personal protective equipment must be worn on site at all times.

HOUSEKEEPING AND WORKPLACE ORGANIZATION GUIDELINES

1. The workplace must be maintained in a clean and sanitary condition free from accumulating trash and debris.

2. Aisles, passageways, ingress and egress access points, and walkways must be maintained free from obstruction (36" minimum).

3. Ground and work area must be maintained in a dry condition as much as possible, considering the nature of the work performed. Spilled liquids must be cleaned up immediately.

4. All stored items must be stacked in a neat and orderly manner that is not conducive to the material shifting or falling.

5. Hoses, cords, and other obstacles must be kept out of walkways when not in use. Equipment must be arranged to minimize the need to run cords and hoses across paths and walkways.

6. Equipment and machinery that is stored on the project site must be stored in an orderly manner that does not block electrical access, ingress and egress points, or any other location that poses a safety hazard or risk.

7. Hazardous materials must be identified and stored in a manner that minimizes the exposure to any workers or potential hazards.

BACK INJURY PREVENTION GUIDELINES

1. Utilize all lifting devices provided whenever possible according to the nature of the lift and related job task.

2. Never lift objects that are heavy or hard to handle without some type of assistance.
3. Where lifting assist devices are not available, assistance from other employees or workers should be requested to lift heavy or awkward objects.
4. Always size the load and assess the object for weight, stability, and balance before lifting it.
5. Plan the most direct and hazard free route of travel to the end destination of the object.
6. In making a lift:
    a. Be sure you have firm and stable footing as near the object as possible.
    b. Bend at your knees and not your waist, keeping your back straight.
    c. Get a good firm grip on the object.
    d. Lift with your legs and not your back.
    e. Keep the load close to your body.
    f. Do not twist at the waist but turn and point your feet in the direction you are moving or traveling with the load.
    g. Lower the load with the same movement used to lift it.
7. If possible, avoid lifting loads from below the knees or above the shoulders.
8. If possible, push an object along the floor rather than lifting it. Avoid pulling objects.
9. Never reach or twist to pick up an object.
10. Do not obstruct your view when lifting or carrying objects.
11. Always lift with a smooth motion rather than jerking a load.
12. Try to break large, heavy loads into smaller, lighter ones.
13. Never attempt a lift that you feel you are not capable of making safely.
14. Never lean over an object in order to lift another object.
15. Never reach or stretch to pick up an object.

ELECTRICAL SAFETY AND RELATED PRACTICES

Generally

The Company does not perform electrical work for its customers. The Company also does not engage other contractors or workers to perform electrical work on behalf of Drake Industries. However, in the event that other contractors are performing electrical work on jobsites and/or in the vicinity of any employee of Drake Industries, the employee must take precautions when performing his or her work.

Basic Electrical Safety Rules

1. Make sure that any power outlets being utilized are protected by a working GFCI.

2. If working around the electrical equipment of other contractors, notify and inform those around you if the tools, cords, or equipment is not in good working condition.

3. Do not work in such proximity to any part of an electrical power circuit that may be accidentally contacted during the completion of the work assignment.

4. Electrical extension cords used on the work site must be three wire, industrial rated type and approved for hard service (i.e. – Type S, ST, SO, STO, SJ, SJT, SJO, SJTO). Cords should be rated for the expected current load. They should be grade 14 Gauge or greater. Household grade/quality extension cords and power strips are not permitted.

5. Ground prongs should be in place on the cord and the equipment being energized and never removed for any reason. Remove any tools or cords with ground prongs missing from service immediately.

6. Electrical extension cords must be protected against accidental damage caused by traffic, sharps, corners; projections and pinching in doors or windows; and possible damage from water.

7. Elevation of electrical extension cords is preferred but cords should not be fastened with staples, hung from nails, or suspended by tie wire.

8. Temporary lights shall be equipped with heavy-duty electric cords, connections and insulation, and maintained in safe condition. Temporary lights shall not be suspended by their electric cords unless specifically designed to do so. They shall be suspended with non-conductive materials.

9. All temporary lights shall be equipped with substantial guards or cages to prevent any contact with the bulb.

10. Electrical cords and cables must be kept out of paths and walkways and should never impede access to an emergency exit or means of egress from a building or structure or fire lane.

11. All electrical cords must be routinely inspected to ensure they are properly insulated, ground prongs are in place, and they are in safe working condition. Employees should inspect electrical cords prior to each use to ensure that the cord is fully insulated and in safe working condition. Defective cords must be taken out of service.

12. Identify and notify appropriate personnel if you notice any hazardous or potentially hazardous situations involving electricity and electrical contact on the jobsite.

13. Provide and maintain sufficient workspace around the area that electrical equipment and installation is being performed.

14. Never attempt to perform service or maintenance on electrical installations, circuits, machinery, or equipment.

FIRST AID

1. Adequate first aid supplies must be provided and maintained for use in the workplace.

2. Emergency telephone numbers and a map to the nearest medical facility must be posted near every telephone.

3. All employees must report any injury or illness, regardless of the severity or magnitude, to an immediate supervisor within 24 hours.

4. Only trained and authorized employees should attempt to provide first aid or CPR.

5. Never attempt to move a victim of an accident until their condition can be assessed by a Qualified Person unless the victim is in immediate danger.

6. Never expose yourself to blood or other bodily fluids or potentially infectious materials without proper training, protective measures, such as personal protective equipment and proper clothing.

7. First aid kits and the supplies in them are intended to be used for self-treatment whenever possible. If further medical attention is needed, or necessary, it must be provided by a qualified medical provider.

8. Items that become contaminated with blood or other potentially infectious bodily fluids must be properly contained and discarded in a manner that will not expose others. If you are not sure, treat every item which contacted blood or body fluids as though it is contaminated. Isolate the articles from any further contact and notify your supervisor immediately.

FORKLIFTS AND HEAVY MACHINERY

1. Only workers who are trained, licensed and authorized shall operate powered industrial trucks, including Hydro-Mulch trucks, forklifts, skid-steers, excavators, and other heavy machinery (collectively, “Heavy Machinery”).

2. Operators must visually inspect Heavy Machinery prior to the beginning of use on each work shift.

3. Heavy Machinery that have identified defects or unsafe conditions must be reported to a supervisor immediately and must not be operated until adequate repairs are made.

4. The owner's manual and any operator's manual for Heavy Machinery shall be available to operators.

5. Each operator shall be trained on the proper use of the piece of Heavy Machinery and shall have access to any relevant manual regarding the operation of the Heavy Machinery.

6. The brakes of a highway trucks or trailers must be set, and the wheels chocked to prevent rolling before loading or off-loading with a forklift.

7. Heavy Machinery engines must be turned off when not in operation.

8. The forks of a forklift must remain in a lowered position when driving without a load. The forks must always be lowered to the floor or ground level when forklifts are dismounted or parked.

9. The operator must never allow additional passengers or riders on the vehicles or forks at any time.

10. Loads being carried on ramps must remain on the uphill side of the vehicle when ascending or descending the incline.

11. Operators must sound horns when traveling in areas where vision is obstructed, such as around corners and through bay doors, or between debris piles.

12. The load capacity of the Heavy Machinery must never be exceeded.

13. Never walk under or permit another person to walk under a load being elevated by a forklift.

14. Never park forklifts or Heavy Machinery near emergency exits.

15. Forklifts and skid-steers must be equipped with an overhead protection rack and an audible warning device (horn) and back up alarm.

16. Any other safety devices or equipment attached to a forklift or other Heavy Machinery such as lights must be in operating condition.

17. An operator must be present while loads are elevated, or Heavy Machinery is being filled, loaded, or tampered with.

18. Never operate Heavy Machinery if you are not authorized, have taken medication that prohibits such actions, or otherwise are not confident in your ability to do so.

19. An operator must use spotters when operating Heavy Machinery around working crews, other equipment, or dangerous substances.

DRAKE INDUSTRIES
Reclamation & Environmental Services

SECTION IV

FLEET SAFETY PROGRAM

FLEET SAFETY POLICY

This policy outlines Drake Industries' management controls and driver expectations for drivers of vehicles that are: company assigned for the purpose of reducing the risk of vehicle accidents, injuries, and property damage.

Everyone shares in the responsibility to make this Fleet Safety Program a success. To avoid misunderstandings, specific responsibilities are outlined as follows:

Drivers

1. Read, understand, and follow the requirements contained in this program.
2. Participate in any company-sponsored activities intended to improve driver safety.
3. Maintain a valid driver's license and adhere to any restrictions.
4. Complete the 'Disclosure & Authorization Form', thereby providing signed permission for the company to obtain your motor vehicle records (MVR).
5. Complete and pass a drug and alcohol test pursuant to Company policy.
6. Abide by all local, state, and federal regulations and pay for any moving violation(s) that result in a fine.

Supervisors

1. Implement the Fleet Safety program,
2. Ensure the 'Disclosure & Authorization Form' is completed by each driver,
3. Ensure a 'Fleet Safety Program Acknowledgement Form' is signed by each driver and maintained in the employee's file,
4. Secure and retain documentation for all driver training,
5. Investigate all vehicle accidents and ensure accident/incident reports are completed as described in the Accident Reporting and Investigation section herein.
6. Order and evaluate an MVR for each authorized driver annually.
7. Follow-up with insurance providers to bring claims to a close.
8. Administer any disciplinary actions or restriction as described in this policy.

Authorized Use of Company Vehicles

Company vehicles are to be driven only by authorized employees. Drake Industries, LLC will not assign or authorize the use of a company vehicle if:

1. The driver does not possess a valid driver's license,
2. The driver possesses licenses from more than one state,
3. The driver's license is suspended or revoked for any reason, or
4. A Motor Vehicle Report (MVR) indicates driver have an unacceptable number or severity of violations.

In addition, the driver may be subject to termination if his/her license is revoked, unless a suitable non-driving job is available. The driver may be subject to other disciplinary action if his/her license is only temporarily suspended. Drivers and passengers of Company vehicles are prohibited from consuming alcohol in or around Company vehicles, regardless of if the vehicle is in use. If it is established that a driver or passenger of a Company vehicle consumed alcohol in or around a Company vehicle, before, during, or after work hours, the employee is subject to immediate termination.

Company vehicles are for Company business only and not for personal use unless such use is previously authorized by the Company's President. To drive a Company vehicle an employee must have a valid license, satisfactory driving record, and comply with Vehicle Fleet Safety Policy. Motor vehicle records verification will be conducted annually on all company drivers. All Commercial Motor Vehicle Drivers must abide by Federal Motor Carrier Regulations as well as the Company's Vehicle Fleet Safety Policy.

Unauthorized use of a Company Vehicle may result in disciplinary action, up to and including suspension of driving privileges or dismissal of the driver. If the unauthorized use results in a collision, the responsible employee may also be required to make restitution for the repair costs to the Company Vehicle.

Accident Reporting and Investigation

Accident Reporting: Drivers are required to notify his/her immediate supervisor and the Company's President of ANY accident as soon as practicable.

The following should be used as guidelines only for post-accident procedures:

1. Safely pull onto the shoulder of the road (if possible),
2. Assess the scene – make sure it is safe for you to get out and render help,
3. Call the local police to report and 911 for Emergency Medical Services (if needed),
4. Secure the scene – to preserve evidence for an accident investigation,
5. Do not discuss the accident with anyone at the scene except the police, and
6. Call supervisor or Company President to report the accident.

7. Complete and submit a Company Incident Report.

Accident Investigation (On Scene by Drivers)

1. Record the names and addresses of all the involved parties, including any witnesses, the occupants of other vehicles, and police and medical personnel who arrive at the scene,

2. Provide the other party(s) with your name, address, phone number, driver's license number, and insurance information,

3. Do NOT accept any responsibility for the accident, and don't argue with anyone,

4. Draw a diagram of the accident scene and note the street names and locations of traffic signs, signals, and approximate distances to each,

5. Take photos of property damage, skid marks, etc. (do not take photos of victims),

6. Obtain a copy of the police report, if available,

7. Cooperate fully with any follow-up from our insurance claims personnel,

8. Forward all accident investigation documentation to your supervisor as soon as possible,

9. If directed, complete a post - accident drug and alcohol test as soon as possible after the accident. If not possible within two hours after the accident, notify your supervisor to explain the circumstances.

Accident Investigation by Supervisor

1. Review all evidence to determine accident cause(s) and preventability, and

2. Inform Operations Management of investigations findings and recommendations.

3. Complete the accident investigation report (as necessary).

Driver Training

All authorized drivers shall complete a Defensive Driving Course (DDC) within one month of vehicle use authorization, and/or as deemed necessary by management.

Vehicle Inspection & Maintenance

Drivers of company vehicles are expected to perform periodic safety inspections of their assigned company vehicles. On some construction sites, employees must perform daily vehicle inspections and must be document such inspections (see 'Light Vehicle Inspection Form' below). Trailers and hitches shall be inspected before each use. Vehicles and trailers found to be unsafe shall not be operated and reported immediately to a Company Supervisor and/or President. All

products, equipment, or other items loaded and/or transported using a Company trailer must be properly secured to the trailer using the appropriate tie-downs, chains, and anchor points necessary for each specific piece of equipment or item.

Scheduled and preventative maintenance (i.e. oil changes, tire rotations, etc.) are the responsibility of the driver. Notify a Company Supervisor and/or President for any unscheduled maintenance needs.

In the Event of a Tire Blow-Out

When summer approaches and temperatures begin to climb pay particular attention to your tires. As it gets hotter, tires run hotter and it is critical to maintain good air pressure and overall maintenance. Check pressure, tread, sidewalls (for cracks), and separations. If you are un-sure then please get a partner and make sure you are running on safe tires.

1. Get off the roadway safely and get completely out of the traffic.

2. If blown tire is on the traffic side, get into a parking lot or some other place AWAY from traffic.

3. If blown tire occurs on the freeway on the driver's side, get off the freeway. We'd rather you damage a rim than be injured or feel un-safe.

4. Beware of traffic and other drivers during ANY emergency.

Driver Safety Expectations

Anyone who drives a company vehicle shall follow all applicable laws and regulations and drive in a safe and defensive manner. Specifically:

1. Wear a seatbelt (including all passengers),

2. Maintain the vehicle in safe operating condition, inspect it regularly, and report any defects to your supervisor,

3. Report ANY and ALL incidents and moving violations to your supervisor as soon as possible,

4. Report any changes in status to your driver's license to your supervisor as soon as possible,

5. Notify your supervisor of any injury, illness, physical condition or use of medication that may impair or affect your ability to drive a motor vehicle,

6. Keep the vehicle clean, including the interior,

7. Secure all loads and loose items,

8. Park so your 'First Move is Forward'.

9. Conduct a 'Circle for Safety' before getting into your company vehicle.

10. Ensure the vehicle is adequately secured to deter theft by removing all valuables when parked, and utilizing all security features.

Drivers Shall Not

1. Operate a company vehicle at any time when his or her ability is impaired, affected or influenced by alcohol, illegal drugs, medications, illness, fatigue or injury,

2. Allow any non-authorized personnel to drive a company vehicle,

3. Carry any passengers in the beds of company pickup trucks,

4. Carry cargo that extends over the cab.

5. Transport flammable liquids and gasses unless DOT or UL approved container are utilized, and only then in limited quantities and only when necessary,

6. Leave vehicle engine running while the vehicle is unattended,

7. Text, talk on a cell phone (unless coupled to a hands-free device), or utilize any device in violation of any local ordinances, state, or federal statutes while the vehicle is in motion.

COMPANY ISSUED PROPERTY

All property maintained by Drake Industries shall be kept in the best possible working condition. Company equipment such as laptops, cell phones, GPS, and hand-held radios aren't to be left in Company vehicles or personal vehicles. Employees who violate this policy may be required to replace lost or stolen company property. Drake Industries reserves the right to monitor at any time any communications that use Drake Industries networks in any way, including data, email, voice mail, telephone logs, Internet use and network traffic, to determine proper use.

It is the Company's responsibility to issue basic safety equipment to ensure a safe work site. The responsibility of the employee is to use and maintain equipment properly and to replace anything lost or damaged through negligence.

You would not, we're sure, want the Company to take your personal possessions from your property without your permission. It works both ways - Company property should not be removed from the project site without the written permission of the supervisor.

DRAKE INDUSTRIES
Reclamation & Environmental Services

SECTION V

DISCIPLINARY PROGRAM

DISCIPLINARY PROGRAM

All employees are expected to conduct themselves in a manner that contributes to an effective, productive, safe and harmonious working environment. If employees do not meet the Company's standards of performance and/or conduct, including but not limited to violating the Company's safety policies, or any other federal, state, or agency policy, corrective action, up to and including discharge, may be taken. Work performance encompasses many factors, including attendance, punctuality, personal conduct, job proficiency and general compliance with the Company's policies and procedures.

It is within management's discretion to determine what measure of discipline would be appropriate under each circumstance. The Company does not employ mandatory progressive steps of corrective action and retains complete discretion to skip any or all corrective steps or options up to and including the decision to make an immediate termination.

The intent of corrective action is to formally document problems while providing the employee with a reasonable time within which to improve performance. The process is designed to encourage development by providing employees with guidance in areas that need improvement, such as poor work performance, violations of safety policies, attendance problems, personal conduct, general compliance with the Company's policies and procedures, and/or other disciplinary problems.

At its discretion, management may apply any of the following corrective actions:

1. Counseling may be used, when appropriate, to coach or help an employee recognize a performance deficiency or to correct work-related issues. This option is most effective when issues first arise and is generally handled through discussions with the employee that identify the problem and offer guidance and suggestions of resolution within a reasonable time frame.

2. The Company may require that the employee undergo additional training regarding the policy, practice, or procedure that the employee violated.

3. A verbal notification (warning) is generally used when issues have not been resolved through counseling or the severity of the problem warrants an immediate warning. When issuing a verbal warning, managers are required to make a written record of the discussion for placement in the manager's own file or, if appropriate, the employee's personnel file. Management, at its discretion, may issue multiple verbal warnings.

4. A written notification (warning) should be presented to the employee if verbal warning(s) have not led to the resolution of an issue or problem. The notification should detail the description of the deficiency and/or weakness, provide a course of action to correct the deficiency and/or weakness, identify objective standards to measure improvement, state a reasonable period of time within which to demonstrate improvement, and clearly state the consequences for lack of improvement. The employee should acknowledge in writing receipt of the warning and include any

additional comments before signing it. A record of the discussion and the employee's comments will be placed in the employee file in the Company's main office

5. A Performance Improvement Plan is a document created by a manager to outline an employee's area of performance that needs improvement by identifying specific issues or problems. The performance plan then provides a defined road map for improving that performance. The plan should include the consequences if the employee's performance does not improve to the expected level. The employee should sign the plan as acknowledgement of receipt and keep the original. The manager should retain a signed copy for placement in the employee's personnel file.

6. Involuntary termination may be appropriate when reasonable efforts have been made to help an employee improve their performance, when an employee's performance or conduct warrants termination, or when business conditions warrant a reduction in the work force. Management retains complete discretion to make immediate termination decisions. Managers are required to inform Human Resources if there is a need for an involuntary termination prior to any discussions with the employee.

SUBCONTRACTOR SAFETY REQUIREMENTS

The Company supports and complies with all local, state and federal safety regulations and expects its subcontractors also to comply with all applicable laws and regulations.

If a subcontractor's workers are responsible for a violation of the Company's Safety Programs, Policies, or practices and procedures, local, state or federal regulations, Drake Industries reserves the right to take disciplinary action against the subcontractor, including but not limited to removing the subcontractor from Drake Industries' jobsite. In addition, the Company has the option to issue a fine at any step in its sole discretion or take any other action(s) that can educate, correct, discipline and lead to the compliance that the Company expects of its subcontractors and their workers.

DRAKE INDUSTRIES
Reclamation & Environmental Services

APPENDIX

FORMS

Form No.	Description
001.	Jobsite Hazard Analysis Form
002.	OSHA 300 Form and Instructions
003.	Workplace Incident Form
004.	Report of Significant Work Exposure to Bodily Fluids (For use in Arizona)
005.	Exposure to Bodily Fluid Investigation Form (For use outside of Arizona)
006.	Workplace Evaluation of Respiratory Risks
007.	Noise Exposure Measurement Log
008.	Bloodborne Pathogen Exposure Control Plan Checklist
009.	Job Safety Warning
010.	Safety Suggestion Form
011.	Safety Meeting Form
012.	Vehicle Accident Report
013.	Record of Hearing Protection Equipment Issued

EMPLOYEE ACKNOWLEDGMENTS

Ack. No.	Description
001.	Acknowledgement of Receipt of Company Safety Programs and Policies
002.	Agreement to Comply with Drug Policy
003.	Hepatitis B Vaccination Acknowledgment
004.	Hearing Conservation Program Training Acknowledgment
005.	Disclosure and Authorization of Motor Vehicle Records
006.	Fleet Safety Acknowledgment

007. HAZCOM Safety Program Acknowledgment

008. Bloodborne Pathogen Training Acknowledgment

009. Acknowledgment of Receipt of Fire Protection and Prevention Safety Program

010. Acknowledgment of Receipt of Benzene Awareness Safety Program

011. Acknowledgment of Receipt of Confined Safety Program

012. Acknowledgment of Receipt of Heavy Machinery and Forklift Safety Program

013. Acknowledgment of Receipt of Personal Protective Safety Program

014. Acknowledgment of Receipt of Tool Safety Program

TRAINING MATERIALS

Train No.	Description
001.	OSHA Heat Safety Handout and Reference Sheets
002.	Hearing Protection Fact Sheet and Charts
003.	Tool Safety Training Log
004.	Ladder Safety Training Log
005.	Heavy Machinery and Forklift Training Log
006.	Hearing Conservation Program Training Log
007.	Fire Protection and Prevention Training Log
008.	Environmental Exposure Program Training Log
009.	Confined Spaces Training Log
010.	Bloodborne Pathogen Program Training Log
011.	CDC FAQ's about Respiratory Fit Tests