Donahue McNamara Steel, LLC

Steel Erectors

Corporate Safety Program

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First Link Safety
A Risk Management Company

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First Link Safety, Inc., Boise, Idaho

Donahue McNamara Steel

Safety Policy Manual

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Donahue McNamara Steel, LLC
Steel Erectors

SAFETY POLICY STATEMENT

It is Donahue McNamara Steel's policy to provide and maintain a safe and healthy work environment for all its personnel.

To achieve this goal, every reasonable effort shall be made to utilize the principles of accident and loss prevention in the management of all activities and programs.

Specifically, it is our management's responsibility to identify, control and/or eliminate known hazards which can result in personal injury or illness, property damage, fire, breach of security, negative environmental impact or any other form of controllable loss.

All personnel are ultimately responsible for their own safety by complying with legislative, company and industry standards, as well as by promptly reporting all unsafe acts or conditions to supervisors. Supervisors are responsible for taking immediate action to solve such problems.

The success of our safety and loss prevention program requires the dedication, commitment, involvement and participation of all personnel working together to achieve this common goal.

Signature of Kevin Donahue (Owner):

Signature of Jack McNamara (Owner):

Signature of Ryan Donahue (Owner):

Signature of Rick Waldron (Safety Director):

SAFETY GOALS

The safety goals of Donahue McNamara Steel are structured around the following principals:

A. All injuries can be prevented.
B. Management and supervision has the responsibility for preventing personal injury.
C. It is possible to safeguard all exposures that may result in injury.
D. It is necessary to train all employees to work safely and to understand that it is to their advantage, as well as the company's, to work safely and that they have a definite responsibility to do so.
E. It is good business from the standpoint of both efficiency and economy to prevent injuries on the job and off the job.
F. Safety is an equal partner with production, cost, and quality of work.

SAFETY OBJECTIVES

The objectives of this policy are as follows:

A. To provide safe and healthy working conditions to the maximum event possible.

B. To achieve the lowest possible number of injuries at all company project locations.

C. To develop in personnel a recognition that:
   - The prevention of injuries is significant and important to the accomplishment of corporate safety goals.
   - Safety performance of each operation will be considered, along with other criteria, when management and Foreman performance evaluations are made.
   - Employee accidents add directly to company costs, whether on-the-job (worker's compensation) or off-the-job (group insurance plans, sick pay benefits, etc.); and the same is true of accidents involving employees dependents covered under the insurance plan.

D. To carry out the company's obligations under federal state, and local safety and health laws and regulations.

E. To achieve the lowest possible level of off-the-job injuries.

POLICY PURPOSE AND SCOPE

A. To assign responsibilities and accountabilities for managing the Corporate Safety Program.

B. To assign individual accountability to corporate staff, project management, Foreman and employees.

C. To set forth the Company policy on safety and standard procedures that will be practiced by all employees. These procedures will be directed toward the common goal of preventing personal injury as well as equipment / property damage.

RESPONSIBILITY AND ACCOUNTABILITY

Corporate Management's Responsibility

In order to achieve the objective of maintaining a safe workplace for all employees, the President, Vice-President, and Project Managers must participate by initiating the Corporate Safety Program and giving their full support to the Program. Corporate management supports the Corporate Safety Program as follows:

A. Ensure all company operations comply with the Corporate Safety Program through monitoring and accountability of Project Managers and Foreman.

B. Assist in communicating the importance of adhering to the Corporate Safety Program through consistent support and monitoring of the projects.

C. Actively demonstrate commitment to the safety and health of all employees and express support for the Corporate Safety Program. This will be accomplished by the adherence to the Corporate Safety Program.

D. Ensure Foreman are provided with the necessary resources, training, budget, and other proven loss control tools to effectively administer a pro-active Corporate Safety Program.

E. Formally recognize Foreman progress in providing a pro-active Corporate Safety Program through awards, letters of commendation, and other positive efforts.

Project Manager/Superintendent Responsibilities

At the project level, the primary responsibility for safety and the Corporate Safety Program and its results is that of the Project Manager/Superintendent. His responsibility is to ensure all policies contained within the Corporate Safety Program are carried out operationally. These

policies will be implemented through direct managerial support. Foreman will be accountable for the following:

A. Ensure all employees follow the policies of the Corporate Safety Program. Employees violating **ANY** safety policy or procedures may be subject to discipline. **(Appendix 1 and 2).**

B. Provide guidance and resources to Foreman for the implementation and maintenance of a pro-active Corporate Safety Program.

C. Ensure that the Foreman fulfills his/her responsibilities for accident prevention outlined in Foreman responsibilities.

D. Ensure, through proper planning and execution, all projects are given a hazard analysis before a task begins. Results of the hazard analysis will be made known to all corporate management for input on how to mitigate the hazards. Ensure all agreed-to mitigation techniques will be implemented. **(Appendix 3)**

E. All hazard analysis training will be documented as to content and those in attendance. Copies will be kept on site and at the corporate office.

F. Ensure Foreman are provided with the necessary resources, training, and other loss control tools to effectively administer a pro-active Corporate Safety Program. This will be accomplished by utilizing corporate safety resources, **First Link Safety Services**, seminars as well as other pro-active safety training.

G. Actively demonstrate their commitment towards the safety and health of all employees and express support for the Corporate Safety Program. This will be accomplished by demonstrating follow through and feedback to the employees on all safety issues brought to their attention.

Foreman Responsibilities

A. Ensure employees follow the company safety policies and procedures. Employees violating any safety policy or procedure will be disciplined and/or discharged depending on circumstances. **(Appendix 1 & 2).**

B. Provide all new employees with a thorough, documentable orientation utilizing a standard safety orientation checklist. A follow-up safety orientation must be completed at regular intervals after initial orientation.

C. Inform the corporate headquarters of all accidents as soon as possible. Investigate all accidents, complete accident investigation reports and ensure proper corrective action

has been taken, all within the shift the accident occurred. Forward all Accident Investigation Reports to corporate office within 24 hours.

D. Observe employee work procedures and correct unsafe practices when found. Corrective action will be documented and kept in the employees work file at the corporate office.

E. Instruct employees in proper job safety procedures. Document the training, and include it in the employee's work file at the corporate office.

F. Ensure identified unsafe conditions are corrected by completion of a weekly inspection checklist. All known unsafe conditions will be corrected immediately. Actions taken will be documented and included in the project files.

G. Conduct and document toolbox safety meetings at least every week with all operations employees. Topics covered in the meeting and its attendants will be included in the project documents and sent to the corporate office.

H. Stimulate and motivate employees to work in a safe manner through aggressive, documented training and re-training on safe work practices.

Employee Responsibilities (Appendix 4)

A. Employees will accept the established Corporate Safety Program as part of their responsibility to eliminate accidents. They should utilize all loss control measures, observing safe work practices, using proper safety devices, using personal protective equipment as required, and making prompt reports to their immediate Foreman at the occurrence of each industrial injury or occupational illness.

B. Employees have a responsibility to encourage fellow workers to work safely and to report existing or potential hazards as they are recognized.

SUB-CONTRACTORS RESPONSIBILITY

The Subcontractor is required to:

A. Adhere to and comply with Donahue McNamara Steel policies and procedures, state and local regulations, and applicable provisions of CFR 29 Chapter XVII - Occupational Safety and Health Administration part 1926 "Safety and Health Regulations for Construction.

B. The sub-contractor is required to instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her work

environment, as well as control or eliminate any hazards or other exposure to illness or injury.

C. The following violations are grounds for **IMMEDIATE REMOVAL** of subcontractor's personnel from a job site.

   1. Disregard of safety and health rules and regulations, repeated violations or refusal to follow safety and health regulations.
   2. Fighting (physical contact), horseplay or gambling.
   3. Theft.
   4. Drugs or alcohol (possession or under the influence).
   5. Willful destruction of property.
   6. Possession of firearms or explosives.
   7. Any act or omission that could inflict or result in bodily harm or death.

D. The subcontractor will conduct a weekly safety meeting with its' personnel. A copy of the written minutes and attendance of each meeting will be given to the Donahue McNamara Steel representative.

E. When necessary, the subcontractor will complete a hazard analysis form and returns it to the project Foreman prior to commencing that portion of work. **(Appendix 3)**

When required by Donahue McNamara Steel and CFR 29 1926, a copy of any certification, designed by engineer, proof of certification, or proof of competent person will be submitted to the Donahue McNamara Steel representative.

Sub-Contractors Pre-Construction Meeting

A pre-construction safety meeting will be held before a subcontractor and its lower tier subcontractors begin work. This meeting will be held with Donahue McNamara Steel project representatives and the contractor's key site representative, such as the job Foreman. Discussion will center on the project safety manual and requirements. It is at this time that the subcontractor will present:

1. A copy of the company written safety program.
2. A copy of the company written hazardous communication program.
3. Name of the contractor's on-site safety coordinator.
4. Name of the competent person when required by federal and state regulations, i.e. excavations and scaffolding.
5. Copy of crane annual inspection. (If applicable)
6. Copy of SDS for all materials that will be used on the project.
7. Proof of qualification for operators, i.e. dozers, cranes, and as required by federal, state and local laws.

8. Any additional items as required by contract documents.
9. Job hazard analysis.
10. Copy of certified drawing, i.e. scaffolding and excavation shoring. (If applicable)
11. Equipment and safety certifications.

Sub-Contractor Safety Violation Notification (Appendix 5 & 6)

If a Donahue McNamara Steel representative notifies the subcontractor or its lower tier subcontractor of any non-compliance with the Donahue McNamara Steel and/or OSHA safety regulations, the subcontractor will immediately correct the deficient conditions. If the contractor fails to comply promptly with the directive, the Donahue McNamara Steel representative may stop all or any part of the work of the subcontractor. In this event, when satisfactory corrective action is taken by the subcontractor, a start order is issued by the Donahue McNamara Steel representative. No part of the time lost due to any safety violation is subject to claim of extension of time or for excess costs or damage by the subcontractor or its lower tier subcontractor.

For serious or repeat violations not corrected within 2 working days, Donahue McNamara Steel can perform or cause to be performed the necessary work and back-charge the contractor who is in non-compliance.

Contractors are required to discipline and/or remove from the work site employees who violate established rules and regulations.

Site Safety Inspection (Appendix 7)

A Donahue McNamara Steel representative (Foreman or designated person) will conduct regular inspections of the job-site. Each sub-contractor will also conduct frequent and regular inspection of his/her work area to assure that safety requirements and practices are being enforced.

This inspection includes, as a minimum:

1. Site conditions.
2. Tools.
3. Materials.
4. Equipment.
5. Any areas that may compromise the safety of individuals or property.

Discussion of all safety deficiencies and corrective action will be noted at the site safety and coordination meeting.

EMPLOYEE SAFETY ORIENTATION (APPENDIX 8)

Federal and State laws require employers to provide to each employee information and training necessary to safely complete his/her job assignment. As part of the employee orientation, it is the responsibility of the Foreman to see that the safety checklist is completed for each new employee.

A. Company Safety Rules (Appendix 4)

All new employees will receive a copy of the company safety rules on their first date of employment.

B. Project Orientation

A project tour will be given in order to identify areas of danger, hazardous materials and location of exits, fire extinguishers and first aid facilities.

C. Emergency Procedures (Appendix 9)

Instruction will be given on specific actions to take in the event of an emergency. This will include where to go and what to do.

D. First Aid/Medical Treatment Procedures

The new employee will be instructed to notify his/her immediate Foreman when an accident occurs and to contact the emergency unit by calling the appropriate posted number. Employees will be briefed on each job site as to the appropriate emergency number.

E. Reporting Injury, Illness, Unsafe Act or Condition

Instruction will be given as to how, where and when to report injuries and unsafe conditions or practices.

F. Personal Protective Equipment

If personal protective equipment is required for the new employee's job assignment, it will be issued to the employee by the Foreman or department manager and specific training will be given on use and care.

G. Job Safety Procedures

The Foreman will instruct the new employee in correct job safety procedures. This training will be consistent with the Standard Operating Procedures (SOP's) for the specific task.

Foreman will emphasize the need for greater safety awareness and provide timely safety training, holding safety meetings with their employees and distributing safety related information.

SAFETY TRAINING/EDUCATION PROGRAM

A. Company's Responsibility

In order to provide a safe work environment, Donahue McNamara Steel is committed to providing adequate and appropriate safety training and education to its employees. Donahue McNamara Steel provides a Safety Orientation Program and ongoing education to keep employees well informed of the safest and most efficient work practices for each respective work area. The safety training programs mainly emphasize accident/injury prevention in various phases of operation.

Safety training and education programs include fire extinguisher use, first aid & CPR training, hazardous materials (where applicable), fall protection, confined space entry, personal protective equipment, and Lock out Tag out.

In addition, the corporate management staff will provide resources as necessary for use by the Foreman in the management of their respective safety challenges.

B. Foreman's Responsibility

The Foreman is responsible to provide a safety orientation to each new employee on how to perform each work task in a safe and efficient manner. The orientation will include the use and care of personal protective equipment, emergency procedures, location of first aid equipment, location of material safety data sheets, and the proper use of hazardous materials (where applicable).

For more information on OSHA's Training Requirements, refer to this webpage: http://www.osha.gov/doc/outreachtraining/htmlfiles/osha2254.html

PROJECT SAFETY MEETINGS (TOOL BOX SAFETY MEETINGS)

Foreman will emphasize the need for greater safety awareness and provide timely safety training by holding safety meetings with their employees and distributing safety related information whenever it is reasonably achievable.

Safety meetings will be held for operations employees at least weekly and a relevant safety subject will be discussed. These meetings will be a minimum of ten minutes and will allow for questions and answers. The meetings will present the opportunity for all members to address safety problems and issues. Documentation of attendees for each meeting will be kept on file for three years.

These meetings will also unveil information on any new hazards or processes introduced into the project that have the potential to effect safety and health of the employees.

SAFETY COMMITTEE POLICY (SEE APPENDIX 10)

Responsibilities

A. Implement and monitor company safety programs.

B. Review the safety performance of all operations of the respective departments, operations and projects.

C. Identify safety deficiencies and establish procedures to eliminate those deficiencies, including onsite inspection programs.

D. Review and make recommendations to management regarding safety suggestions and/or recommendations from individual employees.

E. Review accidents and make recommendations for immediate prevention measures and control of hazards.

F. Analyze accident reports to determine:

- Trends in frequency or severity of accidents that indicate a need for added safety education.
- Problem areas or operations that need increased attention.
- Accidents repeat offenders who may need additional training and supervision.

G. Evaluate accident investigations to determine if reported unsafe conditions and acts have been adequately identified and corrected.

Meet monthly to discuss the reports described above. Information that is to be relayed to employees will be addressed in the weekly project safety meeting and will be posted on the safety bulletin board.

H. Meet monthly to discuss the reports described above. Information that is to be relayed to employees will be addressed in the weekly project safety meeting and will be posted on the safety bulletin board.

I. Coordinate emergency response and evacuation procedures.

Safety Committee Meeting

A. The safety committee will be composed of members selected by corporate management and corporate management representatives.

B. Employee representation on the committee will be for a period of one year.

Safety Committee Guidelines

A. Determine meeting time, place and posting location so that employees as well as members will be informed of upcoming meetings.

B. Maintain, distribute and post written minutes of safety meeting.

C. Maintain and post a current list of safety committee members by name and department. This indicating dates of the committee member's term of tenure.

SITE-INSPECTION (APPENDIX 7)

Each project must be inspected by the Project Foreman or his representative daily to ensure a safe environment and to maintain compliance with current local, State and Federal laws. The results of these inspections will be documented and will be placed in the project file. A recap of deficiencies found and corrections made will be forwarded to corporate office on a weekly basis for budget and training considerations.

During the course of the inspection, an unsafe act or condition may be recognized. If so, action will be immediately taken to eliminate the hazard.

FIRST AID, TRAINING, KITS AND SIGNS

A. All operations Foreman will be trained in first aid and in CPR. If their duties require absence from the job-site then other persons will be designated for first aid.

B. Other persons may be trained and designated by management to surpass or augment the standard requirements.

C. First aid kits will be in accordance with the requirements of the General Safety and Health Standards of **Sub Part C of CFR 1926**. These units will be properly maintained and stocked.

D. Signs listing emergency numbers, procedures, etc., will be located next to each telephone.

POSTING POLICY (APPENDIX 10)

On each project there will be a bulletin board designated for safety related information. This board will include the following:

A. Employer/employee notification of workman's' compensation insurance.

B. Safety bulletins and posters.

C. Emergency telephone numbers.

D. Evacuation layout drawing.

E. Minutes of safety committee and safety department meetings.

F. Significant changes in operations affecting safety and health.

EMERGENCY PROCEDURES (APPENDIX 9)

In case of fire:

A. The first employee to notice a fire should activate the nearest alarm to alert all other people in the building, proceed to the nearest telephone and call the appropriate emergency number and, if possible, notify the nearest Foreman about the location of the fire.

B. All employees should immediately evacuate the building according to the emergency plan located on the safety bulletin boards and proceed to a designated area so that all personnel may be accounted for. All employees should stay within their assigned area until informed to return to the building or to do otherwise.

C. If appropriate, Foreman should turn off equipment and close all windows.

D. Drills will be conducted to reinforce the proper procedures for emergency evacuations. Facilities should be checked during self-inspections for hazards that will restrict quick responses to emergency situations. This checklist will include:

E. Pathways to exits will remain unobstructed.

F. No permanent locking of the exit doors except from the outside.

G. Doors resembling exiting doors will be marked "NOT AN EXIT".

H. Alarms will be checked for physical damage and operating condition.

I. Illumination within the department and individual exiting lights will be bright enough to identify all exit pathways and doors.

ACCIDENT INVESTIGATION AND REPORTING (APPENDIX 11)

Donahue McNamara Steel's Foreman will be notified immediately when an accident has occurred. The first responsibility is to insure that first aid and medical treatment have been administered.

All accidents will be investigated. Pictures of accident site must be taken as soon as possible. Donahue McNamara Steel's Foreman or designated person will be advised of the initial results of the investigation within 24 hours.

In addition, all subcontractors and lower tier subcontractors will forward to Donahue McNamara Steel's representative a copy of DMS's injury report form.

Accident Report Procedures (SEE APPENDIX 12)

1) Injury and/or Illness

a) An employee involved in a work-related injury or illness will report it **immediately** to his/her Foreman.

b) On notification of the injury or illness, the employee and Foreman will complete an incident report and submit it to the corporate office within 24 hours.

c) If the injured worker requires medical treatment, the appropriate accident report form should be completely filled out.

d) The Foreman will complete an accident investigation form and send this, along with signed copies of the appropriate accident form to the corporate office within the shift the accident occurred or when you were notified. Witness reports are required to be filled out and sent with the accident report form.

e) An OSHA 300 Log, supplied by corporate management staff, will be posted by each project Foreman at their job-site.

2) Vehicular Accidents

a) An employee involved in a vehicular accident in the course of his/her employment must report the incident to his/her Foreman immediately.

b) On notification of the accident, the employee's Foreman should conduct a complete investigation immediately. Pictures of the accident site are required.

c) The employee should complete a written statement describing the accident and the appropriate accident report form, if any injury or property damage was incurred.

d) The Foreman will complete his/her portion of the accident report and return it within the day to the corporate office.

e) If the incident is a vehicular injury accident, the Foreman must take the employee to a medical department for treatment.

f) All vehicular accidents must be reported to the corporate office immediately.

ACCIDENT INVESTIGATION (SEE APPENDIX 11)

The purpose of an accident investigation is to discover and correct hazardous conditions and practices in order to provide a safe and productive work environment.

A. Procedure

When a vehicular and/or industrial accident occurs, the following information must be obtained.

a) Who was involved?

b) Exact location of the accident.

c) The exact date and time of the accident.

d) The sequences of events leading up to and involved in the accident.

e) Nature and extent of the injury.

f) What conditions, if any, attributed to the accident?

g) What unsafe act(s) or unsafe condition(s) contributed to the accident?

h) What was the underlying cause or causes of the accident

i) Witness statements.

B. Accident and Investigation Reports

All vehicular and/or industrial accidents must be investigated and the proper reports must be completed and forwarded to the corporate office. A Foreman investigation report must accompany all vehicular and/or industrial injury reports that are turned in to the corporate office.

C. Property Accidents

Accidents involving any vehicle, building and/or equipment must be investigated at the scene of the accident by the appropriate Foreman as soon as possible. All accidents must be reported to the corporate office immediately.

D. Employee's Responsibility (Appendix 4)

The employee is responsible to immediately report an accident to his/her Foreman and to fill out the employee portion of the industrial accident claim form(s) as soon as possible. The completed form(s) must be examined and verified by the appropriate Foreman and forwarded to the corporate office.

RECORD KEEPING (APPENDIX 13)

Records will be kept for three years on all of the following:

1) Log of Occupational Injuries and Illnesses (OSHA 300).
2) All Accident Reports:
   a) Industrial injury
   b) Incident reports

A master file will be maintained by management containing the following:

1. Company policy and procedures covering safety, loss control, accident prevention and a safe, healthy work environment.
2. Minutes of all safety committee meetings three years on file.
3. Inspection reports for three years on file.

MODIFIED WORK POLICY

The purpose of Donahue McNamara Steel's Modified Work Program is to minimize the results of an injury for both the employee and the company.

"Modified work", means temporarily placing the employee in a working environment that would not cause a further aggravation of an injury or previously existing condition. Modified work is accomplished by working directly with the employee, their supervisor and treating physician. Employees and treating physicians must understand the Donahue McNamara Steel modified work program. This is the responsibility of the Project Foreman and the Donahue McNamara Steel Insurance Coordinator.

The employee must notify his direct supervisor and Project Foreman immediately of any injury or condition that would place him or her in jeopardy during normal work assignments. Failure to report any such condition may be grounds for termination of employment and denial of workers' compensation benefits.

If the employee is under a physician's care, the employee must report this to his or her direct supervisor and the Project Foreman immediately. A copy of the treating physician's report listing specific work restrictions must be presented to the Project Foreman. The Foreman will then work with the employee and his direct supervisor to place the employee in a temporary modified work position that will not violate any restrictions listed by the treating physician.

Employees placed in a modified work assignment must inform their supervisor of any required physician visits that may occur during normal working hours. Otherwise, the

employee will be required to be on the project during normal working hours. Efforts will be made to keep the employee working on the project where the injury may have occurred. However, this may not be feasible in all cases. The employee may be required to report to another work location where a more suitable work environment can be developed.

Any employee placed on a modified work assignment will be evaluated on a weekly basis to monitor his or her recovery and ability to return to a regular work assignment. This will be the responsibility of the Project Foreman, working in conjunction with the employee, treating physician, and the Donahue McNamara Steel Safety Director.

Subcontractors who have employees injured or placed in a modified work assignment as a result of an incident that may have occurred on a Donahue McNamara Steel Construction Project are required to provide weekly medical updates on the employee's condition to the Project Foreman and Donahue McNamara Steel Corporate Management.

ALCOHOL AND DRUG ABUSE POLICY

In striving to maintain a safe, healthful and productive work environment Donahue McNamara Steel recognizes that it is not immune from the nationwide societal problem of alcohol and drug abuse. In order to limit the impact of alcohol and drug abuse on the company's workplace and employees, Donahue McNamara Steel has adopted this Alcohol and Drug Abuse Policy

Donahue McNamara Steel prohibits and will take disciplinary action up to and including discharge for the following:

1. The unauthorized use, possession, manufacture, distribution, dispensation or sale of alcohol, drugs or drug paraphernalia on company premises, in company-supplied vehicles, or in any location while on company business. For the purpose of the Policy, "drugs" include marijuana, cocaine, opiates, PCP, amphetamines and any other controlled substances. Unauthorized possession includes possession on an employee's person, as well as storage in a locker, desk, company or personal vehicle, or any other repository on company premises or while on company business.
2. Performing any job duties under the influence of alcohol or drugs on company premises, in company-supplied vehicles, or in any location while on company business. An employee will be considered to be "under the influence" of alcohol or drugs if he or she exhibits recognizable symptoms of alcohol or drug abuse, including, but not limited to, slurred or inappropriate speech, dazed appearance,

uneven gait, altered attention span, other symptoms or tests positive for the presence of alcohol or drugs.

3. The possession, use, manufacture, distribution, dispensation or sale of alcohol or drugs off company premises that may adversely affect the individual's work performance, his or her own or other's safety at work or the company's reputation in the community.
4. Refusal or failure to follow reasonable instructions issued by a supervisor implementing this Policy.

Disciplinary action may also be imposed for the following:

1. Conviction under any criminal drug statute for a violation occurring in the workplace or in another location while on company business;
2. Conviction under any criminal drug statute under circumstances which adversely affect the company's reputation in the community;
3. Failure to notify the company of any conviction under any criminal drug statute within five days of the conviction.

Testing Policy

In connection with this policy, Donahue McNamara Steel has instituted a program to identify employees whose alcohol and drug abuse problems may affect the workplace.

For-Cause Testing

Whenever a supervisor believes that an employee's performance or workplace behavior may have been affected in any manner by alcohol or drug abuse, Donahue McNamara Steel may require that the employee submit a urine sample for drug testing and/or a breath or blood sample for alcohol testing. Any employee who tests positive will be considered in violation of this policy and may face discipline up to and including immediate termination.

Donahue McNamara Steel will utilize one or more certified alcohol or drug testing laboratories and collections sites to assure accurate and reliable results. No result will be considered positive until a screening test has been confirmed by a second, confirmatory test of a different type. At the applicant/employee's request, a positive drug test result may be validated by a second testing laboratory using the same sample.

Random Testing

All employees will be subject to random testing for the presence of illegal drugs. A random test is a test that is unannounced and results in every employee having an equal chance of being selected for testing at any given time. The random selection method used by the company will be determined in consultation with the drug testing agency and will be conducted in a computer-generated random selection method that ensures that all random

testing will be accomplished in a completely arbitrary manner.

Post-Accident Testing

Any employee who is involved in a work related accident (as defined below) will be tested for the use of illegal drugs and alcohol as soon as possible after the accident.

Examples of an accident that will require an employee to take a drug and alcohol test include, but are not limited to, accidents that involve an employee and result in:

1. The death of a person.
2. Bodily injury to another person who requires medical treatment away from the scene of the accident.
3. An injury to the employee that may result in that employee filing a worker's compensation claim and whose lost time will likely exceed one working day; or,
4. Damage to property owned by the company or a third party that may reasonably be estimated to exceed $500.

An employee who is seriously injured and cannot provide a specimen for testing will be required to authorize the release of relevant hospital reports or other documentation that would indicate whether there were drugs or alcohol in their system at the time of the accident.

If it is determined by management that an employee's injury was definitely caused by an unsafe condition and that there was no unsafe act by the injured employee, the company reserves the right to waive post-accident testing under these circumstances.

Employees who are involved in a work-related accident requiring medical attention are to inform their supervisor of the accident as soon as possible so that any needed drug or alcohol test may be promptly conducted in conjunction with their medical treatment.

Policy on Use of Prescription Drugs

Employees may possess and take medication prescribed for them by a licensed physician in accordance with the prescription. However, an employee taking any medication which may impair his or her physical or mental ability at work must report this fact to Donahue McNamara Steel, which, in its sole discretion, will determine whether and for how long the employee's job assignment should be changed. Employees should keep all prescribed medicine in its original container which is labeled with drug identity, date of prescription and name of doctor. Improper use of medication obtained through a prescription is a violation of this policy

Search Policy

In order to enforce the prohibition against illegal activity on company premises, Donahue McNamara Steel retains the right to inspect, without prior notice including the employee's work area, desk, tool box, locker, Donahue McNamara Steel vehicle, or other company property in the custody or control of the employee, as well as the employee's personal effects on company property, including personal vehicles. In addition, the company has the right to restrict or deny any employee access to any part of the company's premises at any time, without prior notice. Refusal to permit an inspection is a violation of this Policy, and may result in discipline up to and including termination.

SAFETY VIOLATION INSTRUCTIONS (APPENDIX 1 & 2)

SAFETY VIOLATION #1 - FIRST WARNING

1. The Safety Violation # 1 form is to be used as the initial warning for a safety violation.
2. The initial form is to be filled out with simple and clear definitions of the items that are not being done or are not in compliance according to the safety policy.
3. The yellow copy of this form is to be given to the employee that is responsible for the safety violation.
4. The white copy is to be forwarded to the Donahue McNamara Steel Corporate Office.
5. The weekly safety meetings must clearly reflect and document the safety needs that are required for each and every phase of the project. Donahue McNamara Steel must show proof of prior safety education to give an employee a safety violation.
6. The violation form should reflect the date that the item in violation was previously discussed and proper procedures explained. If the employee was present the day of the training, their signature should be identified on the safety meeting sheet.
7. Supervisory personnel using the "Safety Violation" form for reasons determined inappropriate will be subject to disciplinary action.

SAFETY VIOLATION # 2 - THE SECOND AND FINAL WARNING!

(This form represents an employee's last chance).

1. Prior to issuance, all documentation of previous meetings, warnings, and safety information, including dates, times, proper signatures and procedures must be assembled.

2. The pink copy is to be given to the employee that is responsible for the safety violation.
3. The white copy is to be forwarded to the Donahue McNamara Steel Corporate Office.
4. It should be made clear to the employee that this is a final warning prior to termination.

OSHA INSPECTION POLICY (APPENDIX 14)

Donahue McNamara Steel considers its relation with OSHA a positive working relationship, both entities intent to eliminate occupational injuries. In this spirit of partnership, Donahue McNamara Steel has developed the following OSHA Inspection Policy.

A. Ask for his/her credentials. If the inspector does not object, make a copy of his/her identification card. If a copy cannot be made, write down the inspector's I.D. number and name.
B. Ask the reason for the inspection.
C. Ask if there is a complaint. If the answer includes an employee complaint, request a copy.
D. Tell the inspector that you are not denying entry, but it is the company policy that you contact the company's corporate offices and the company's authorized representative (First Link Safety Services) prior to allowing entry.
E. A Donahue McNamara Steel designated person will escort the inspector all the time the inspector is on the job-site. Notes should be taken on everything the inspector notes or says. Photos should be taken of everything the inspector photographs, plus 2 photos from different angles. The escort will be the same person during the entire inspection.
F. The inspector has the right to interview any employee in private. Do not attempt to stop the interview; however the escort should ask the employee if the employee has any objection to the escort being present and listening to the interview. If the employee has no objections, the escort should attend the interview, listen and take notes.

When the inspector has left the job-site, notify the corporate office and complete the OSHA INSPECTION FORM. Be specific, the more information the better. **(See Appendix 14)**

For information on the Multi-Employer Citation Policy refer to this OSHA webpage: http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=DIRECTIVES&p_id=2024

CHEMICAL HAZARD COMMUNICATION PROGRAM (APPENDIX 15)

Company Policy

To ensure that information about the dangers of all hazardous chemicals used by Donahue McNamara Steel is known by all affected employees, the following Hazard Communication Training Program has been established:

All departments of the company will participate in the Hazard Communication Program. This written program will be available in the operations office for review by any interested employee.

Container Labeling

The Foreman will designate employees to verify that all containers received for company use will be clearly labeled as to the contents, note the appropriate hazard warning and list the name and address of the manufacturer.

A letter **(Appendix 16)** will be sent to all suppliers of hazardous chemicals used, requesting proper labeling and copies of SDS (Safety Data Sheet) for all chemicals received. A copy of this letter will be kept in file.

The Foreman will designate employees in each section to ensure that all secondary containers are labeled with either an extra copy of the original manufacturer's label or with labels that have the identity and the appropriate hazard warning.

Safety Data Sheets (SDS) (Appendix 15)

The Foreman is responsible for establishing and monitoring the Company SDS program. They or their designee will make sure procedures are developed to obtain the necessary SDS and will review incoming SDS for new or significant health and safety information. They will see that any new information is passed on to affected employees.

Copies of SDS for all hazardous chemicals in use will be kept in the operations office. SDS will be available in a convenient location to all employees during each work shift. If an SDS is not available, immediately contact the Foreman.

Employee Training and Information

The Foreman is responsible for the company's employee safety training program. They will ensure that all program elements specified below are carried out. Prior to starting work, each new employee of Donahue McNamara Steel will attend a health and safety orientation containing the following information and training:

- An overview of the requirements contained in the Hazard Communication Standard.
- Types of hazardous chemicals present in the job site.
- Physical and health risks of the hazardous chemical.
- The symptoms of overexposure.
- How to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment.
- Steps the company has taken to reduce or prevent exposure to hazardous chemicals.
- Procedures to follow if employees are overexposed to hazardous chemicals.
- How to read labels and review SDS to obtain hazard information.
- Location of the SDS file and written hazard communication program.

After completion of the training, each employee will sign a training acknowledgment receipt **(Appendix 17)** documenting the training received.

Hazardous Non-routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks. An example of non-routine tasks is a confined space entry in a trailer where there has been a large spill.

Prior to starting work on such projects, each employee will be given information by the Foreman or designee about the hazardous chemicals he or she may encounter during such activity.

This information will include specific chemical hazards, protective and safety measures the employee can use, and steps the company is using to reduce the hazards, including ventilation, respirators, presence of another employee and emergency procedures.

Multi-employer workplaces

It is the responsibility of the Foreman to provide employees of any other employer at the work-site copies of SDS (or make them available at a central location) for any hazardous chemicals that the other employer(s)' employee may be exposed to while working in conjunction with Donahue McNamara Steel. The Foreman will also inform other employers of any precautionary measures that need to be taken to protect employees during normal operating conditions or in foreseeable emergencies and provide other employers with an explanation of the labeling system that is used at the work-site.

List of Hazardous Chemicals (Appendix 18)

The SDS book will contain a list of all known hazardous chemicals on an individual job site. This list must be updated whenever new hazardous chemicals are introduced into the workplace. A complete review by a member of management should be conducted once a year.

HOT WORK POLICY (APPENDIX 19)

Hot Work is any operation that requires an open flame or that generates enough heat to cause a fire. Individual owners may require a written policy and procedures to be followed prior to any Hot Work operation. DMS has developed its Hot Work policy to prevent fire in accordance with NFP.A No 51B.

All Hot Work and the implementation of DMS 's policy is the responsibility of the individual Project Foreman or his designated representative. A DMS representative will inspect the work area and confirm that the policy has been followed and that no fire hazards exist.

RESPIRATORY POLICY

The purpose of Donahue McNamara Steel's Respiratory Policy and program is to ensure the protection of all employees from respiratory hazards. The responsibility of ensuring that the Respiratory Policy and program are followed is that of the Project Foreman or his designated representative. **First Link Safety Services** will provide training and an equipment fit test as required prior to any respiratory operation

Respirators are to be used **ONLY** when engineering, administrative, or work practice controls are not feasible, while engineering controls are being installed or in emergencies.

Respirators will be selected on basis of hazard to which the employee will be exposed. Only MSHA/NIOSH certified respirators will be selected and used. See **CFR 29 part 1926 Table E-4.**

The Corporate Safety Director will be contacted prior to any selection or use of respirators. Respirators are to be the last line of defense.

The user of respirators will be instructed in the proper use and the limitations of respirators. The instructions will be given by a person who possesses knowledge of respirator use.

The user will receive as a minimum, the following instructions:

1. Proper fitting of respirators. (Test face-piece to face seal)

2. How to adjust the respirator.
3. Conditions that prevent a good face-piece to face seal:
    - Growth of beard.
    - Absence of one or both dentures.
    - A temple piece on eyeglasses
    - Skull caps that project under face-piece
    - Failure to follow manufacturer's face-piece fitting instructions.

Whenever possible, the respirator will be assigned to an individual employee for his/her exclusive use.

Respirators issued for the exclusive use of one worker will be cleaned after each day's use. For respirator used by more than one employee, the respirator will be thoroughly cleaned and disinfected after each use by each worker.

Respirator will be stored in a clean and sanitary location in a manner so the respirator will not be exposed to sunlight, dust, chemicals, excessive heat or cold, and moisture. The respirator will not be hung a by its straps or stored inside gang boxes.

Respirators used routinely will be inspected for worn and damaged parts during the cleaning operation. Respirators used for emergency use will be inspected at least once a month and after each use.

Appropriate surveillance of the work area conditions and degree of employee exposure or stress will be maintained.

Regular inspection will be conducted while respirator operations are being performed to determine that proper use, inspection, cleaning, and storage of respirators are being met. No person will be assigned to a task requiring the use of a respirator until it has been determined that person is physically able to perform the task while using the respirator. A physician will determine that an employee is physically able to perform the task while using the respirator. A physician will determine that an employee is physically able to wear the respirator. The respirator user's medical status will be reviewed annually or as conditions warrant.

(Mandatory) Information for Employees Using Respirators When Not Required Under the Standard

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, of if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.

2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.

3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.

4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

LEAD POLICY (APPENDIX 20)

DMS has developed a lead policy to comply with requirements set forth by OSHA.

If lead is encountered, or if lead is suspected to be present in a work area, the Project Foreman will discontinue work in that area, and notify Donahue McNamara Steel corporate office. Donahue McNamara Steel and First Link Safety Services will then develop a site specific written program to mitigate the lead exposure.

The responsibility for the enforcement of the site specific written program procedures is that of the individual Project Foreman.

BLOOD BORNE PATHOGENS POLICY (APPENDIX 21)

Donahue McNamara Steel has developed a Blood Borne Pathogens policy to eliminate or minimize employee occupational exposure to blood or certain other body fluids, comply with the OSHA Blood Borne Pathogens Standard CFR 1910 or applicable state or industry standards, and to ensure the safety of its employees.

As needed, individual site specific programs will be developed for projects in which employees may have increased risk of exposure to blood borne infection. The responsibility of making that determination is that of the DMS corporate office and **First Link Safety Services**. If a determination is made that an increased risk is present, a suite specific policy will be developed and the content of the policy will be followed.

The responsibility of ensuring that the site specific policy is implemented and followed is that of the Project Foreman.

CONFINED SPACE POLICY (APPENDIX 22)

DMS has developed a Confined Space Policy in accordance with the OSHA Confined Space Standard. The policy establishes uniform requirements to ensure that the hazards of confined spaces at Donahue McNamara Steel job sites are evaluated, safety procedures implemented, and that the proper hazard information is transmitted to all affected workers.

The Donahue McNamara Steel Corporate Safety Director is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of the program. The Corporate Safety Director is the sole person(s) authorized to amend these instructions and are authorized to halt any operation of the company where there is danger of serious personal injury. The responsibility of the site specific confined space program is that of the Project Foreman. The Foreman will have the authority to halt any operation of the company where there is danger of serious personal injury.

FALL PROTECTION POLICY (TECHNICAL SAFETY REQUIREMENTS)

Donahue McNamara Steel considers fall protection a priority in ensuring the safety of its employees and subcontractor's employees. For this reason, the DMS Fall Protection Policy requires all DMS employees and all subcontractors and their employees to adhere to the DMS Fall Protection Policy and to follow all applicable 29CFR 1926 OSHA Regulations.

The responsibility of ensuring that all employees adhere to the Donahue McNamara Steel fall protection policy is that of the superintendent and / or supervisor. It is also the responsibility of the individual employee to follow the fall protection policy/plan and use all personal fall protection equipment according to OSHA requirements and the manufacturer's recommendations.

EXCAVATION POLICY (TECHNICAL SAFETY REQUIREMENTS)

According to OSHA a trench is referred to as a narrow excavation made below the surface of the ground in which the depth is greater than the width, the width not exceeding 15 feet. An excavation is any man-made cut, cavity, trench, or depression in the earth's surface formed by earth removal.

Unguarded excavations are always hazardous and, whenever work is not actively in progress, they must be marked in a manner that will prevent any person from inadvertently walking into them. This task should be accomplished by its most practical means considering the population, terrain, and traffic of the area. It is the responsibility of all personnel involved in any operation to assure that all excavations are adequately marked.

Planning for Safety (Appendix 23.1)

Many on-the-job accidents are a direct result of inadequate initial planning. Correcting mistakes in shoring and/or sloping after work has begun slows down the operation, adds to the cost, and increases the possibility of an excavation failure. Donahue McNamara Steel will build safety into the pre-bid planning in the same way all other pre-bid factors are considered.

Before preparing a bid, these specific site conditions will be taken into account:

1) Traffic.
2) Location of structures and their conditions.
3) Overhead and underground utilities.
4) Soil.
5) Surface and groundwater.
6) Water table.
7) Weather.

These and other conditions will be determined by job site studies, observations, test borings for soil type or conditions, and consultations with local officials and utility companies.

Before any excavation actually begins the estimated location of utility installations that may be encountered during digging will be determined, (sewer, telephone, fuel, electric, water lines, or any other underground installations, etc.). Also, before starting the excavation, Donahue McNamara Steel will contact the utility companies or owners involved and inform them, within established or customary local response times, of the proposed work.

To find the exact location of underground installations, employees will use safe and acceptable means. If underground installations are exposed, they be removed, protected and properly supported.

Employees who are exposed to vehicular traffic will be required to wear warning vests or other suitable garments marked with or made of reflective or high-visibility material. Donahue McNamara Steel will provide these items and will ensure that they are worn.

On-The-Job Evaluation (Appendix 23.2)

The OSHA standard requires that a competent person inspect, on a daily basis, excavations and the adjacent areas for possible cave-ins, failures of protective systems and equipment, hazardous atmospheres, or other hazardous conditions. If these conditions are encountered, exposed employees will be removed from the hazardous area until the necessary safety precautions have been taken. Inspections are also required after natural (e.g. heavy rains) or man-made events such as blasting that may increase the potential for hazards. The responsibility for the inspections is that of the Foreman or his designated representative.

Protective Support Systems

Donahue McNamara Steel and OSHA require that in all excavations in which employees are exposed to potential cave-ins, a protective system must be in place to protect those employees. These systems can include sloping or benching the sides of the excavation; supporting the sides of the excavation, or placing a shield between the side of the excavation and the work area.

Prior to designing a protective system, a number of factors including soil classification, depth of cut, water content of soil, changes due to weather and climate, or other operations in the vicinity will be determined to ensure the system is proper.

Sloping

Donahue McNamara Steel employs the OSHA mandated sloping guide for all of its excavations, on all of its projects. They are as follows:

Soil Type	Slope Angle	Degree	Benching
Solid Rock	Vertical	90	N/A
A	3/4 : 1	53	4'
B	1 : 1	45	4'
C	1-1/2 : 1	34	No

If a soil type is not known, it will be considered Type "C".

Excavations in excess of 20 in depth will be designed by a registered engineer. The data used to determine the design must be in writing and must include sufficient explanatory information to enable the user to make a selection, including the criteria for determining the selection and the limits on the use of the data. At least one copy of the information, including the identity of the registered professional engineer who approved the data, will be kept at the work site during construction of the protective system.

Trench Boxes

Trench boxes will be used when other protective measures are not feasible. The trench boxes will be designed by a professional engineer and will have the design data with the box. If allowed by the manufacturer, boxes can be stacked and pinned. No personnel will be allowed in the trench box during the placement operation.

Shoring

Shoring will be used when other protective measures are not feasible. Shoring will be designed in accordance with the OSHA standard and/or will be manufactured equipment designed for shoring (Speed-Shore). A competent person will be present during the installation of the shoring.

Support Systems

Support systems such as shoring, bracing, or underpinning will be provided to ensure the stability of adjacent structures such as buildings, walls, sidewalks or pavements. No excavations will be allowed that are below the level of the base or footing of any foundation or retaining wall unless:

1. A support system such as underpinning is provided.
2. The excavation is in stable rock.

3. A registered professional engineer determines that the structure is sufficiently removed from the excavation and that excavation will not pose a hazard to employees.

Installation and Removal of Protective Systems

Donahue McNamara Steel requires the following procedures for the protection of employees when installing support systems:

1) Securely connect members of support systems.
2) Safely install support systems.
3) Never overload members of support systems.
4) Install other structural members to carry loads imposed on the support system when temporary removal of individual members is necessary.
5) As soon as work is completed, the excavation should be backfilled as the protective system is dismantled. After the excavation has been cleared, workers should slowly remove the protective system from the bottom up, taking care to release members slowly.

Water Accumulation

Donahue McNamara Steel prohibits employees from working in excavation where water has accumulated or is accumulating unless adequate protection has been taken. If water removal equipment is used to control or prevent water from accumulating, the equipment and operations of the equipment must be monitored by a competent person to ensure proper use.

Hazardous Atmospheres

Excavations greater than four feet in depth must be tested as well as ones where oxygen deficiency or a hazardous atmosphere exists or could reasonably be expected to exist, before an employee enters the excavation.

If hazardous conditions exist, controls such as proper respiratory protection or ventilation must be provided. Also, controls used to reduce atmospheric contaminants to acceptable levels must be tested regularly.

Where adverse atmospheric conditions may exist or develop in an excavation, emergency rescue equipment, (e.g., breathing apparatus, a safety harness and line, basket stretcher, etc.) will be readily available. This equipment must be attended when used.

Access and Egress

Safe access and egress to all excavations will be provided to all personnel working in the excavation. Excavations four feet deep or more are required to have adequate means of exit, such as ladders, steps, ramps or other safe means of egress, must be provided within 25 feet of lateral travel. If structural ramps are used as a means of access or egress, they must be designed by a competent person.

Additional Hazards

In addition to cave-in hazards and secondary hazards related to cave-ins, there are other hazards from which workers must be protected during excavation related work. To protect employees from these hazards, Donahue McNamara Steel requires the following precautions be taken:

1) Keep materials or equipment that might fall or roll into an excavation at least two feet from the edge of excavations, or have retaining devices, or both.
2) Provide warning systems such as mobile equipment, barricades, hand or mechanical signals, or stop logs, to alert operators of the edge of an excavation. If possible, keep the grade away from the excavation.
3) Provide scaling to remove loose rock or soil or install protective barricades and other equivalent protection to protect employees against falling rock, soil, or materials.
4) Prohibit employees from working on faces of sloped or benched excavations at levels above other employees unless employees at lower levels are adequately protected from the hazard of falling, rolling, or sliding material or equipment.
5) Prohibit employees under loads that are handled by lifting or digging equipment. To avoid being struck by any spillage or falling materials, require employees to stand away from vehicles being loaded or unloaded. If cabs of vehicles provide adequate protection from falling loads during loading and unloading operations, the operators may remain in them.

LOCKOUT - TAGOUT POLICY

Purpose:

This procedure establishes a lockout practice for securing machinery and equipment during periods of construction. It is essential that all subcontractors are consistent with their lockout procedure to insure the safety of all employees. A lockout procedure is to render inoperative electrical systems, pumps, pipelines, valves and all other such energy systems that may accidentally be energized or started up while employees are working on them or before they are mechanically ready and released for service.

Each contractors and subcontractors Safety Representative will administer the lockout program. All locks and applicable tags will be issued by the contractor and/or subcontractor's Safety Representative to their foreman and employees as they are requested. The contractor's/subcontractor's Safety Representative will maintain a lock and tag log.

Procedure:

All energy sources shall be locked out and a "DANGER" tag affixed to the equipment or system indicating who installed the lock, craft, contractor's name, phone number, and the reason the system was locked out. Each employee shall be responsible for hanging their own lock and tag on the proper piece of equipment before starting work. No employee or other contractor may work behind a lock and tag belonging to another employee. Contractor or subcontractor supervision shall be responsible for assisting each employee in locating the proper piece of equipment to be locked out and tagged. Each employee involved with lockouts shall have a lock with an individual key. No locks with duplicate or master keys shall be used. Craft or gang locks shall not be used. Contractors and subcontractors are required to identify lockout / tagout locks by either paint, die markings etc.

If more than one employee is required to lockout and tag a circuit or piece of equipment, a multiple padlock device shall be used. After locking out and tagging a circuit, an attempt to energize the equipment shall be made by depressing-or turning to "on" all starting stations before work begins. In no case shall work begin before circuits and equipment is tested to ensure that they are, in fact, de-energized.

Any employee who removes a tag or lock belonging to another employee or person, or overrides a tag or lock in anyway, shall be terminated immediately. Written authorization must be obtained from the foreman and Project Manager of the responsible contractor when a lock has been left on a piece of equipment and the originator is not available for removal.

When locks and tags are required, the craft personnel working on that Circuit shall notify their appropriate supervisor. The supervisor, or his designee, shall see that appropriate locks and tags are provided. When work is completed, the appropriate supervisor is also to be notified when the lock(s) and tag(s) are removed.

Electrical systems which share a power source with a common main breaker may be worked as follows:

1. Where practical, the main breaker shall be opened and locked out per the Lockout Procedure.
2. In cases where fuses are used to sub feed Branch circuits (more than one circuit) being supplied from one main breaker and the panel will not accept a padlock

with a buddy device, the panel may be locked with the door key, the key then may be locked in a (Key Lock Box) which will accept a padlock and a buddy lock device. The fuses removed will be listed in the log book as if they were a main breaker.

Electrical systems being started up where locks are required for a few minutes on different parts of the systems shall be worked as follows:

1. The person doing the work shall lock out the equipment he or she is working on. This lock must be logged out to the person using the lock in the log book. In the event the lock should be required overnight, or off shift, then the equipment shall be locked and logged out in accordance with the Construction Lockout Procedure.

Examples of energy sources that are required to be locked out and tagged are:

1. Electrical systems as they are energized will be locked out by the responsible electrical contractor until they are released to the owner's representative. Anytime repairs or modifications are made to electrical systems, either temporary or permanent, they shall be locked out. Locks shall be applied to the main disconnect switch whenever possible. **All locks must be accompanied by a tag.**

2. Electrical systems that provide electrical power to equipment such as pumps and electrical motors shall be locked out by the appropriate subcontractor until such time that system is released.

3. Pipelines, valves and other such sources that could be inadvertently activated, causing a hazardous condition, shall be locked out, blanked off or otherwise secured to prevent accidental activation.

4. Lines, valves and similar systems that are being tested pneumatically or with other gases such as nitrogen, shall be tagged and/or locked out to prevent an accidental discharge of the pressure within the line. In addition, areas affected by the pneumatic test shall be barricaded against entry and inspected by the contractor or subcontractor's Safety Representative prior to commencement of the test.

When multi-worker or multi-craft situations exist, a multi-lockout tab is to be used. These devices allow for multiple locks for protection of all craft involved. Each lock must be properly tagged.

After equipment or systems are turned over to the owner no work or modifications will be done without Compliance to the Owner's Lockout/ Tagout Program.

When interface work is required on energized operations equipment, operations personnel must de-energize and lockout according to their procedure. Once operations have rendered equipment and systems safe, then the contractor or subcontractor will lock on top of the owner's lockout system.

COMPANY VEHICLE FLEET POLICY

Overview

As a driver of a company vehicle, the authorized driver has been given certain privileges. Our employee assumes the duty of obeying all motor vehicle laws, maintaining the vehicle properly at all times and, otherwise, following the policies and procedures outlined in the following policy.

Vehicle Fleet Purpose

Company vehicles are provided to support business activities and are to be used only by qualified and authorized employees. They are not to be considered a part of an employee's compensation and will not be used as an inducement for employment. In all cases, our vehicles are to be operated in strict compliance with motor vehicle laws of the jurisdiction in which they are driven and with the utmost regard for their care and cost-efficient use. Our company vehicles may not be used for business activities of other companies or organizations. Vehicles may not be driven to foreign countries without prior approval of management.

Management Responsibilities

Our company management will be responsible for the implementation and maintenance of the fleet program. It is the responsibility of our management personnel to advise employees of the fleet program, provide initial safety orientation, and enforce the program should an employee operate a motor vehicle in a manner which is inconsistent with our policy.

- Management shall also provide CDL vehicles with safety devices including air pressure indicators, rear view mirrors, wheel chocks, safety struts, fire extinguishers, first aid kits, extra bulbs (lights) and flares / reflective triangles.
- Supervisors are responsible before the start of each shift to make sure drivers are in shape to drive and that vehicle inspections are completed and documented.
- Supervisors are responsible for driver orientation and training as described below.

- Supervisors are responsible for overseeing drivers attend weekly safety meetings. Also make sure all meetings / training is documented.
- Management shall discipline and document drivers as required.

Driver Licensing

Company drivers and anyone authorized to drive our company vehicles must have a valid driver's license issued in the state of residence for the class of the vehicle being operated and must be able to safely drive the vehicle. Obtaining a driver's license is a personal expense and responsibility.

Driver Qualifications

Driver qualifications are as follows:

1. Must meet our Company's drug screening requirements.
2. Must be an authorized employee of our company.
3. Must have vision correctible to at least 20/40.
4. Must have at least one year of experience in the class of vehicle operated.
5. Must meet licensing requirements.
6. CDL drivers must meet commercial driver qualification requirements
7. CDL drivers required to transport placarded hazardous materials must have a valid hazardous material endorsement with their license.
8. CDL drivers required to pass a company road test as a condition of employment.
9. Employees will not qualify for a company vehicle if, during the last 36 months, the driver has had any of the following experiences:

    - Has been convicted of a felony involving a company vehicle.
    - Has been convicted of sale, handling or use of drugs.
    - Has had automobile insurance cancelled, declined or not renewed by a company.
    - Has been convicted of an alcohol- or drug-related offense while driving.
    - Has had driver's license suspended or revoked.
    - Has been convicted of three or more moving violations or one or more other serious violations or at fault accident.
    - Has been convicted of reckless driving or speed contest.
    - Has been involved in two or more chargeable accidents.
    - Has been found guilty of leaving the scene or failure to report an accident.
    - Conspiracy or misrepresentation of identity.

In addition, CDL drivers and driver applicants will be disqualified to drive a commercial vehicle per Department of Transportation (DOT) standards:

- Until mandatory driver qualification requirements are achieved.
- Driver refused to be tested (for alcohol or drugs) by state or jurisdiction.

Review of Motor Vehicle Record

State Motor Vehicle Records (MVRs) will be used as the source for verifying driver history. MVRs will be obtained and reviewed periodically. Driving privileges may be withdrawn or suspended and/or the company vehicles removed for any authorized driver not meeting the above requirements. In addition, appropriate disciplinary action may be taken.

Driver Records and Corrective Action

Personnel files will include MVR, fleet accident histories, and corrective action documentation for employees who drive either company-owned vehicles or employee-owned vehicles used for company-related business.

Levels of corrective action shall include:

- No Action: One moving violation and/or non preventable accident in a three-year period.
- Counseling: Two moving violations in a three-year period and/or a preventable accident. The operator shall be advised by company management of his or her responsibility towards driving in a safe, courteous, and economical manner in accordance with the defensive driving concept.
- Suspension: Two preventable accidents, three or more moving violations or one major violation within a three-year period. The driver shall have driving privileges removed for a probationary period to be established by our Company Management. This includes driving of all company-owned vehicles as well as use of the driver's personal vehicle on company-related business. If any additional moving violations or major violations occur within the probationary period, the driver will not be permitted to drive any company vehicles or drive their own vehicle for any company-related purposes. If the employee's position is one that requires regular driving of company vehicles or driving of personal vehicles for company business, this may lead to termination of employment due to the inability of the employee to adequately perform his/her required employment duties.
- Revocation: Two or more preventable accidents in combination with three or more moving violations, three preventable accidents, four or more moving violations, or more than one major violation within a three-year period. The driver shall have all

driving privileges removed for all company-related activities. This includes the use of company-owned vehicles and the use of the driver's personal vehicle for company related business. If the employee's position is one that requires regular driving of company vehicles or driving of personal vehicles for company business, this may lead to termination of employment due to the inability of the employee to adequately perform his/her duties.

Definitions:

Preventable Accident: "A collision in which the driver failed to do everything reasonable to prevent it". ("At-Fault" accidents typically are preventable accidents.)

Major violation: DWI, DUI, reckless driving, leaving the scene of an accident, vehicular homicide, speed in excess of 15 mph over the designated speed limit, driving under suspension or revocation, fleeing a police officer, chemical test refusal, unlawful transportation or use of weapons or explosives.

Personal Use

Company vehicles are provided primarily for business purposes; however, occasional personal use is permitted. *Personal use is a privilege extended only to the authorized employee.* The privilege of personal use may be withdrawn at any time without notice by the company.

The following rules apply to personal use of company vehicles:

- Only authorized employee may drive.
- The company vehicle may only be used for incidental trips within 25 miles of your home.
- Personal trailers, including boats and recreational vehicles, are not to be pulled.
- Company vehicle is not to be driven while under the influence of alcohol or any controlled substance.
- Possession, transportation or consumption of alcohol or illegal drugs by anyone in the vehicle is not allowed.
- Driver and all passengers must wear available personal restraints.
- Report any accident immediately to police and your manager.

Any exceptions to these rules requires advance, written approval by approved company manager or officer. Violation of these rules will result in disciplinary action from removal of driving privileges up to and including discharge.

Maintenance

Authorized drivers are required to properly maintain their company vehicles at all times. Vehicles should not be operated with any defect that would inhibit safe operation during current and foreseeable weather and lighting conditions. Preventive maintenance such as regular oil changes, lubrication, tire pressure and fluid checks determine to a large extent whether you will have a reliable, safe vehicle to drive and support work activities. You should have preventive maintenance completed on your vehicle as required in the owner's manual.

Personal Cars Used on Company Business

Any person, using their personal vehicle for company business must meet the following criteria:

- Satisfy the company driver qualification requirements.
- Provide a certificate of insurance with limits of liability of at least $100,000/300,000/50,000.
- The company must be named as additional insured on the driver's liability insurance policy.
- The vehicle must pass a documented company safety inspection.

Our organization does not assume any liability for bodily injuries or property damage the employee may become personally obligated to pay arising out of an accident occurring in connection with operation of his/her own car. The reimbursement to the employee for the operation of his/her car on company business includes the allowance for the expense of automobile insurance. The company does not specify and assumes no responsibility for any other coverage employees carry on their own cars since this is a matter of individual status and preference.

Traffic Violations

Fines for parking or moving violations are the personal responsibility of the assigned operator. The company will not condone nor excuse ignorance of traffic citations that result in court summons being directed to itself as owner of the vehicle. Each driver is required to report all moving violations to our company office within 24 hours. This requirement applies to violations involving the use of any vehicle (company, personal or other) while on company business. Failure to report violations will result in appropriate disciplinary action.

Please be aware that traffic *violations incurred during non-business (personal use) hours* will affect your driving as well and are subject to review.

Accidents Involving Company Vehicles

In the event of an accident:

- Do not admit negligence or liability.
- Do not attempt settlement, regardless of how minor.
- Get name, address and phone number of injured person and witnesses, if possible.
- Exchange vehicle identification, insurance company name and policy numbers with the other driver.
- Take a photograph of the scene of accident, if possible.
- Call the police if injury to others is involved. You may want to call police even if there are no injuries.
- Complete an accident report.
- Turn all information over to your supervisor within 24 hours.

Accident Reporting and Review

Every driver is required to promptly report to our main company office any accident in which he/she is involved while operating a company owned or leased motor vehicle. This means reporting any contact between the company vehicle and another vehicle, person, or fixed object which results in death, injury, or property damage. Single vehicle accidents must be reported regardless of the severity of damage to the vehicle or injury to the driver. Such contact must be reported as an accident regardless of who was hurt, what property was damaged and to what extent, where it occurred, or who was responsible. All accidents must be reported to our main company office as soon as possible, but absolutely no later than 24 hours after the accident. All the facts, favorable or otherwise, must be reported. Copies of any police reports generated by the accident will be requested by management for review.

All motor vehicle accidents shall be reviewed by our main company office to determine if an accident was preventable, and if so, whether corrective action should be suggested for the employee or driver in question.

Preventable Accidents

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

1. Classification of preventable accidents
   a) Following too close
   b) Driving too fast for conditions
   c) Failure to observe clearances

d) Failure to obey signs
e) Improper turns
f) Failure to observe signals from other drivers
g) Failure to reduce speed
h) Improper parking
i) Improper passing
j) Failure to yield
k) Improper backing
l) Failure to obey traffic signals or directions
m) Exceeding the posted speed limit
n) Driving While Intoxicated (DWI) or Driving under the Influence (DUI) or similar charges.

2) Fines for preventable accidents
   a) In order to remind drivers of their responsibility to drive defensively, a fee will be charged to the driver for each preventable accident as defined above. This fee, which applies to each accident, will be capped at the lesser of the actual damages or $500. This is a mandatory fine. Any exceptions to this policy will require the approval of our company president.

Thefts

In the event of theft of a company vehicle, notify local police immediately.

Driver Responsibilities

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

- Remain qualified by:
  - No more than 4 points accumulated from moving violations preventable accidents in accordance with the ***Driver's Rating Sheet***
  - Carry a current CDL or operator's license
  - Carry a current physical examination card (every 2 years)
  - Carry current controlled substance test results
- Operation of the vehicle in a manner consistent with reasonable practices that avoid abuse, theft, neglect or disrespect of the equipment.
- Vehicle inspections are to be performed by the operator prior to the beginning of the work day to ensure the vehicle is fit for safe operation. Any problems or concerns noted during the inspection should be reported immediately to the driver's supervisor.

- Perimeter inspections should be performed around the vehicle prior to entry into the vehicle - to reduce the potential of backing into or striking stationery objects.
- Obey all traffic laws. Know the local traffic regulations.
- Plan haul routes to minimize exposure, consider volume of traffic, schools, and congested areas.
- Drivers are responsible to avoid tracking dirt and mud onto roadways, use authorized entrances and exits with the proper storm water BMPs installed.
- The use of seat belts and shoulder harnesses are mandatory for driver and passengers.
- Adhere to manufacturer's recommendations regarding service, maintenance and inspection. Vehicles should not be operated with any defect that would prevent safe operation.
- Attention to and practice of safe driving techniques and adherence to current safety requirements.
- The use of vehicles is restricted to authorized drivers only.
- Drivers of rented trucks shall follow the same company policies as owned trucks
- Drivers will limit their working hours to 10 hours per day except in emergencies
- Report the occurrence of moving violations to supervisor.
- Transportation or storage of firearms, explosives, and associated devices or materials will not be permitted in company owned or leased vehicles.
- Transportation or storage of illegal drugs is strictly prohibited in company owned or leased vehicles, or in personal vehicles being used for company-related business.
- Driving under the influence of drugs and/or alcohol, as defined by State statute, is strictly prohibited in company owned or leased vehicles, or in personal vehicles being used for company-related business.

Failure to comply with any of these responsibilities will result in disciplinary action.

Driver Training

Driver error is the leading cause of accidents. All drivers must maintain a high level safety awareness to avoid accidents. Training will begin during orientation and continue on throughout the driver's employment. Types of training conducted will include the following:

1. Orientation

It is very important to get the driver "off in the right direction" and should minimally include:

- Driving procedures
- Company policies and expectations
- Company employees and responsibilities
- Equipment familiarization and training
- Parking Procedures
- Location of the Donahue McNamara Steel Vehicle Inspection Forms

2. Driver Safety Meetings

Safety meetings are valuable in providing "quick hit" type accident prevention information and maintaining open lines of communications between management and the driver. Driver safety meetings should be held on a regular basis. Topics that may be discussed are as follows:

- A discussion of recent accidents or near misses.
- A review of new laws, regulations or local ordinances.
- Safe driving practices, driving courtesy or general driving safety.
- Care and maintenance of vehicles.
- Physical problems involving driving such as reaction time, fatigue, stopping distances or weather.
- First aid or general health issues.

3. Instructional Driver Training

Approximately once a year, a driver training program may be presented to drivers. Also, the same type of training program may be required as a retraining tool for drivers who have had marginal driving experience. The purpose of these training programs will be to increase driver awareness and understanding of safe, courteous and efficient driving, and of accident avoidance techniques. Some of the programs which may be presented include:

4. Hazardous Materials Driver Training:

Drivers who transport hazardous materials, who are not required to have a CDL with a hazardous materials endorsement, must receive function specific training as required by government standards. Training must include:

- Pre-trip safety inspections
- Use of vehicle controls and equipment, including operation of emergency equipment
- Operation of vehicle, including turning, braking, backing, parking, handling, and vehicle characteristics including those that effect stability, such as braking and curves, effect of speed on vehicle control, dangers associated with maneuvering through curves, danger associated with weather and road conditions that the driver may experience
- Procedures for maneuvering tunnels, bridges and railroad crossing
- Requirements pertaining to the attendance of vehicles, parking, smoking, routing and incident reporting
- Loading and unloading of materials including load securement

All employees who are responsible for the transport of hazardous materials must receive general awareness/familiarization training per government standards initially upon hire and once every three years thereafter. A written record must be maintained. This training should provide employees with a familiarity of standard and enable the employee to recognize and identify hazardous materials consistent with the hazardous communication standards of the hazardous materials regulation.

For Hire (Sub Haulers, Subcontractors)

For hire drivers and their vehicles contract with our company for the purposes of moving materials from one location to another. While completing this task, the for hire driver represents our organization and as such, must comply with the rules and regulations of our company plus all state, federal and local laws and ordinances. In addition, the for hire drivers and their company must provide our organization proof of insurance in the amount of $1,000,000 combined single limit for their vehicle(s). In regards to driver qualification and vehicle condition, the for hire company will, at our company's request allow auditing of driver qualification files, vehicle condition reports and vehicle maintenance files.

Safe Driving Practices - Driver rules for the road:

All company drivers are expected to drive in a safe professional manner at all times. Drivers should follow the following basic or fundamental safe driving procedures.

1) *Speed and following distance*

a) Most rear-end accidents occur when the trailing vehicle is following too close and/or going too fast. Make sure to maintain a two second to four second spacing (plus additional spacing for vehicle length and speed) interval between your vehicle and the vehicle in front of you.

b) Always drive at or below the posted speed limit and no faster. There may be times where speed should be adjusted due to the prevailing traffic flow. Safety should always be the primary consideration.

c) Always comply with "advisory" speed limit warnings posted along construction sites or at congested intersections. Although these speed limits are not enforced by authorities, drivers are expected to fully comply with advisory speed limits.

d) When driving in inclement weather or when towing a heavy load, additional spacing should be allowed between your vehicle and the vehicle in front of yours. Speed should also be reduced.

2) *Proper lane changing techniques*

a) Numerous accidents occur when drivers fail to use proper lane changing techniques. When making a lane change, always check for vehicles approaching the intended lane or in the intended lane.

b) Always signal before making a lane change.

c) Do not depend on mirrors to detect vehicles traveling in your blind spot. Take a quick glance over your shoulder to check all blind spots before making a lane change. Not doing so is the primary cause of lane change accidents.

d) Make sure all rear view and side view mirrors are properly adjusted before beginning your trip.

3) *Proper passing techniques*

a) Always allow sufficient space in which to pass. Serious head-on collisions have occurred when the driver "thought" he/she had enough space to pass. When in doubt, DO NOT PASS.

b) Always use you turn signals to let drivers behind and in front know you are about to attempt a pass. Also use your signal before pulling back into the right hand lane.

c) Pass only where it is legal to pass. DO NOT pass on hills, curves, at intersections, on bridges, in no passing zones or where double yellow lines are present.

d) After passing a vehicle, do not depend on rear view or side view mirrors to judge ample space to return to the right lane. Glance over your shoulder to confirm the position of other vehicles and to confirm there is adequate space to pull back into the right lane.

e) Do not pass unless it is absolutely necessary. If the vehicle in front of you is going the legal speed limit, what reason is there to pass?

4) Precautions at intersections

a) Always reduce speed when approaching an intersection even if you have the green light or crossing traffic has a stop sign. Many accidents have occurred when the "other person" proceeded through a red light or ran a stop sign. Drive for yourself and the other person.

b) When your light turns green, do not immediately proceed into the intersection. Look both ways before entering the intersection even if you have the right-of-way. Confirm that all crossing traffic has come to a complete stop.

c) When two vehicles approach a four way stop sign at the same time, the automobile to your right has the right-of-way. If there is confusion, always use hand signals and to be safe yield to the other driver. Do not be impatient.

d) If you observe a vehicle following closely behind you as you approach an intersection, tap your brake three or four times to make sure the other person is aware you are about to stop. This could prevent a rear-end collision.

e) If you are at an intersection waiting to make a left or right hand turn and the vehicle approaching you from the left has its turn signal on to turn right at the intersection, do not assume the other person will actually turn. Many times they don't.

5) Driving on interstate highways and freeways

a) Always drive at or below the posted speed limit. Refer to "Speed and Following Distance" earlier in this document.

b) When merging onto a multi-lane interstate, signal prior to merging and use the entrance ramp to pick up speed allowing you to enter traffic at the same speed as the traffic flow. DO NOT stop at the end of the entrance ramp and wait for traffic to clear.

c) Do not assume vehicles traveling in the right lane will move over, allowing you to merge into traffic. Many times they will not move over. This causes accidents on a regular basis.

d) If there is a vehicle in front of you on an entrance ramp, continuously move your eyes from the side view mirror to the vehicle in front. DO NOT disregard the vehicle directly in front of you. Many times vehicles being driven by elderly individuals will slow down and

sometimes come to a complete stop on the entrance ramp. Rear-end collisions associated with this situation are common.

e) When exiting an interstate, use your turn signal and exit at the same speed as the traffic flow. Many drivers will slow down as they approach the exit ramp. This is a serious hazard.

f) If you happen to drive past your intended exit, do not backup along the shoulder of the interstate. Instead, continue on to the next exit.

6) Proper backing procedures

a) Avoid backing up whenever possible. Before backing up your vehicle, walk around the vehicle to check for any objects in your path. Never assume your path is clear. Do not depend entirely on rear view and side view mirrors to detect objects in the path of your vehicle.

7) Proper turning techniques

a) Make every effort to be in the turning lane 200 to 300 feet prior to the intersection. Many accidents occur when drivers make a last second decision to make a turn.

b) Drivers should signal well in advance of the turn. Most state laws require a driver to signal at least 100 feet before making a turn.

8) Poor weather technique

a) Be extremely careful not to signal for your turn if, before reaching your intended turn, there is another street or driveway where you can turn. There have been numerous accidents when drivers thought the vehicle was going to turn before reaching them, but instead proceeded into or through the intersection. During heavy rain storms, drivers should increase following distance an additional four seconds. When pulling heavy loads or driving a heavy class vehicle, increase your following distance up to eight seconds.

b) During or after heavy rain storms, reduce speed well in advance of intersections, interstate ramps and other areas where vehicles merge.

c) During inclement weather (rain, fog, etc.) reduce overall speed to compensate for poor road conditions and visual impairment. Numerous accidents have occurred due to hydroplaning as a result of driving too fast for existing road conditions. Standing water WILL cause a vehicle to hydroplane.

9) Protecting against vehicle theft

a) Always lock your vehicle and take the keys with you. Make sure all windows are closed securely.

b) Do not leave valuables visible in your vehicle. Put them where they cannot be observed, but do so before you park so you will not be observed storing the valuables.

c) Park in well lighted and fenced areas when possible. At home, park in the driveway, or better yet in a locked garage. Avoid parking on the street. Park in secured areas when possible.

d) To thwart thieves, turn wheels sharply to the right or left. With front-wheel drive vehicles, use the emergency brake and put the vehicle in park to lock all four wheels.

e) If your vehicle is equipped with an anti-theft device, use it. Visible devices may discourage thieves.

f) Do not leave your driver's license or vehicle registration card in your vehicle. If the vehicle is stolen, a thief may use these documents to impersonate you.

g) Do not leave anything in the vehicle with your address on it. It may invite home burglary.

h) Do not discuss your destination, cargo contents, or other information with non-company personnel.

Acknowledgement of Responsibilities

My signature below confirms that I have been instructed as to the rules and responsibilities of our company's driver safety policy. I have read, understand and agree to abide by the conditions as stated in this document regarding the operation of any vehicle for company business.

_____

Print Employee Name **Date**

_____

Employee Signature

GLOSSARY OF TERMS

Authorized person means a person approved or assigned by the employer to perform a specific type of duty or duties or to be at a specific location or locations at the jobsite.

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

Qualified person means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.

Controlled access zone (CAZ) means an area in which certain work (e.g., overhand bricklaying) may take place without the use of guardrail systems, personal fall arrest systems, or safety net systems and access to the zone is controlled.

Guardrail system means a barrier erected to prevent employees from falling to lower levels.

Hole means a gap or void 2 inches (5.1 cm) or more in its least dimension, in a floor, roof, or other walking/working surface.

Infeasible means that it is impossible to perform the construction work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

Leading edge means the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

Low-slope roof means a roof having a slope less than or equal to 4 in 12 (vertical to horizontal).

Lower levels means those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

Opening means a gap or void 30 inches or more high and 18 inches or more wide, in a wall or partition, through which employees can fall to a lower level.

Safety-monitoring system means a safety system in which a competent person is responsible for recognizing and warning employees of fall hazards.

Steep roof means a roof having a slope greater than 4 in 12 (vertical to horizontal).

Toeboard means a low protective barrier that will prevent the fall of materials and equipment to lower levels and provide protection from falls for personnel.

Unprotected sides and edges means any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches high.

Walking/working surface means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

Warning line system means a barrier erected on a roof to warn employees that they are approaching an unprotected roof side or edge, and which designates an area in which roofing work may take place without the use of guardrail, body belt, or safety net systems to protect employees in the area.

TECHNICAL SAFETY REQUIREMENTS

GENERAL SAFETY AND HEALTH

1. General Safety and Health will be as outlined in **Sub Part C of CFR 1926**.
2. A fire protection and prevention plan will be developed and maintained for the duration of the project. (1926.24)
3. First-aid and medical care will be established prior to project start-up. (1926.23)
4. Emergency telephone numbers for physicians, hospitals, ambulance and fire department will be posted at each phone.
5. Toilets will be furnished to meet or exceed the requirements of **Table D1 of 1926.51**.
6. An adequate supply of potable water will be provided in all places of employment. Single service cups and a trash receptacle in which to place the used cups will be provided.
7. Hearing protection is to be used in areas where the noise exposure can be anticipated to meet or exceed the DBA in **Table D2 of 1926.52**.
8. Only qualified and trained employees with proof of qualification will be allowed to operate laser equipment.
9. If asbestos is encountered, the following steps will be taken:
    - Evacuate all employees from the area containing asbestos.
    - Contact the Foreman, Project Manager, and the corporate office.
    - **DO NOT** attempt to remove any asbestos.
    - **DO NOT** enter asbestos contamination area until a licensed contractor has removed the asbestos and air sampling results have been obtained showing that the air is free from asbestos.
10. Hazardous Communication CFA 1926.59
    - A copy of the company hazardous communication program will be maintained at the job site.
    - Employee will be trained in the handling of all hazardous material present at the work place.
    - Data Safety Sheets are to be kept for each hazardous material at the work place.
    - The SDS will be maintained in a manner where employee will have access to the SDS. The SDS book will include a table of contents and be arranged in a manner for quick access.
    - The SDS book should contain only those SDS that correspond to material at the work place at that time.

- On a project where an owner is occupying any portion of a building and his employee could be exposed to any hazardous material, the owner will be notified in writing the location of all Donahue McNamara Steel SDS and request the same information from the owner for his SDS.
- All containers that have hazardous materials are to be labeled i.e. gas cans, form oil cans, curing compound cans, etc.
- If an employee is exposed to a hazardous chemical, a copy of the SDS will accompany the employee to the treating physician.
- In the event that personnel are not able to read the SDS, a person will be assigned to assist the employee in understanding the material. This includes personnel that are non-English speaking.

HOUSEKEEPING

It is the policy of DMS that all projects and work areas will not be allowed to have debris accumulate. Trip and fall accidents are a major injury cause in the construction industry. These types of incidents can be directly related to poor housekeeping. Therefore the following will be the minimum requirements.

1. All walkways, ramps, stairway, and access points to ladders will be kept free of debris or stored material.
2. All trash and debris will be cleaned up and disposed of on a daily basis.
3. Laydown areas, parking lots and temporary facilities will be kept in a clean and orderly manner.
4. Trash barrels will be located at each water bucket location and used cups will be deposited in the trash barrel.
5. All combustible material, such as oily rags, will be deposited in a separate container with a lid to prevent the possibility of fire.
6. No glass bottles are allowed on the site.
7. Construction materials such as scrap sheet rock, broken block \ brick, and loose conduit will be picked up on a daily basis.
8. All materials will be stacked, piled, or stored in a manner to prevent falling or collapse.
9. Each sub-contractor will be responsible for controlling and removing any materials or debris created by work performed by their employees. If after being notified by a Donahue McNamara Steel representative, a subcontractor does not keep his/her portion of work cleaned, Donahue McNamara Steel (after 24 hours written notice) will perform the necessary clean-up and the subcontractor will be charged in a time and materials manner.

10. All scraps that are produced from employee lunches will be removed from the job site daily by the employee. Employee's failure to comply may result in his/her removal from the project.
11. Scrap wood and other materials will have nails removed or bent-over as the material is initially removed.

PERSONAL PROTECTIVE EQUIPMENT

Personal Protective Equipment (PPE) is equipment designed and intended to enhance an individual employees' protection from hazards in the workplace. Employees who do not have and use the adequate PPE will be in violation of the Donahue McNamara Steel safety program and will not be allowed to continue their work until adequate PPE is acquired and training in its use is completed. Once PPE is issued, it is the employee's responsibility to see that it is maintained in good safe condition. PPE will be inspected daily.

Some items may be furnished for a specific use or project only. This equipment will be signed out to you specifically and you will be responsible for its care and return before leaving the project.

Head Protection

Hard hats are required at ALL times, except in designated break areas, office trailers, or while riding \ operating enclosed passenger vehicles.

1. Hard hats will meet American National Standards Institute Z 89.1 - 1969.
2. Hardhats are to be worn face forward, with the adjustable fitting in back and the brow cushion in front. Hard hats will be unaltered and free of paint.

Footwear

1. Sturdy leather work will be worn at all times during construction activities. Tennis shoes, track shoes, sandals, loafers, or athletic shoes are NOT considered proper footwear for a construction site. Steel toed boots or foot guards will be required for certain construction activities i.e. operating hand operated compacting equipment, operating a jack hammer, or when the hazard of foot injury exists.
2. Rubber boots will be worn for concrete work.

Eye and Face Protection

1. Employees will have safety glasses with side shields with them at all times. All employees will wear eye protection appropriate for the tasks being performed. The type of eye protection required should be determined during the pre-job and pre-task planning. Non-ANSI Z47 glasses are not suitable when safety glasses are required.

2. Before using any type of tool or machine, always refer to the manufacturer's user guide for the required eye and face protection.
3. During the placement of concrete, eye protection is mandatory. Concrete finishers during the finishing stages are not required to wear eye protection.
4. Eye and face protection will be utilized in accordance with **CFR 1926.102 table E1**.

Clothing

1. Tank tops, muscle shirts, and sleeveless shirts are prohibited on site. Loose fitting garments, shirt tails, or floppy sleeves will be contained at all times.
2. Long pants are required at all times.

Hearing Protection

1. Donahue McNamara Steel has a mandatory hearing protection policy for all employees when an exposure exists. Hearing protection is required to be used when ambient or local noise levels exceed 85 DBA.
2. Hearing protection will be supplied in the form of foam earplugs and will be available on the project. Training in the proper use of earplugs is required.
3. Disposable earplugs will not be reused. Always wear clean earplugs.
4. Appropriate for the activity, other types of protection will be supplied and used (e.g. Muffs).
5. Hearing protection per **CFR 1926.101** will be used as required.

Hand Protection

1. Gloves will be worn when handling certain chemicals, sharp objects, hot objects, or when the possibility of hand injury exists and for winter protection.
2. Gloves are mandatory in demolition work.
3. Protective equipment as outlined on Material Safety Data Sheet will be worn when working with hazardous materials that are under the guidelines of CFR 1926.59.

FIRE PROTECTION

A fire on any of our projects could be devastating. The intent of fire protection is to prevent the potential for a fire. If a fire should start then we need to know how to minimize the damage.

Fire prevention is a function of planning, organization, housekeeping, and safe work practices by all employees. The most important element under our control is good housekeeping. Keep combustible materials picked up and stored in dedicated areas away from ignition sources. Loose materials or debris will not be tolerated on the project. This is everyone's responsibility.

Emergency fire procedures will be posted at the project office. All employees should be familiar with these emergency procedures.

Local fire service providers should be contacted during the initial phase of the project. They should be familiar with the location of the project. They will pre- plan for access into the job site, types and quantities of combustibles on site and any other information critical to their efforts. In many cases the fire department will also provide emergency rescue and medical services.

Fire extinguishers will be provided throughout the project and in hot work areas. Employees should be trained to identify and use the appropriate fire extinguisher and when to call for professional assistance.

1. General fire protection and emergency equipment must be kept free and clear from obstructions at all times and be properly located. This equipment must be easily visible and accessible.
2. A fire extinguisher rated not less than **2A** will be provided for each 3000 sq. ft. of building area or travel distance will not exceed 100'. If fire barrels are substitutes for **2A** fire extinguishers, they must be 55 gallon, open top, with 2 each fire pails (with rounded bottoms) at each barrel. Fire barrels should be kept from freezing when applicable.
3. A fire extinguisher rated not less than **10B** must be located within 50 feet of wherever 5 gallons or more of flammable or combustible liquid or gas is being used.
4. All flammable or combustible liquids and gases must be stored a minimum of 20' from all buildings (This includes office trailers).
5. Oxygen and acetylene cylinders must be separated by 25' while in storage, or by a one hour rated wall.
6. A fire extinguisher will be located within 5' of each set of oxygen and acetylene bottles, while welding and cutting operations are being performed. All combustible materials will be removed to a distance that will not allow heat, sparks, or slag to pose a fire hazard.
7. Outdoor portable fuel storage tanks will be contained within a dike area with a curb of a minimum of 12" in height around the perimeter of the tanks. Tanks will be provided

with emergency venting. Tanks will have one (1) portable fire extinguisher having a rating not less than **20B**, and it will be kept not less than 25' and not more than 75' from the liquid storage area.

8. No smoking signs will be posted at **ALL** flammable storage areas, i.e. fuel tanks, paint storage.
    - Any person that discharges an extinguisher for other than fire extinguishing or other valid reason will be removed immediately from the project and will be subject to immediate termination.
    - As required by the project, a trained and equipped firefighting (Fire Brigade) organization will be established and maintained.
    - As required by the project, a cutting, burning, and or welding permit may be needed. Upon completion, the work area will be examined by the person in whose name the permit is issued to insure that all sparks, or embers are extinguished. The permit will be signed and returned to the Project Foreman.

TEMPORARY HEATING

Temporary heat requirements are an important tool to allow Donahue McNamara Steel to efficiently work through the colder months. Temporary heat improves working conditions, as well as allows certain construction activities to continue in colder weather. To accomplish these goals, each employee will comply with safety regulations (OSHA 1926.154) in order to assure a risk free environment from such hazards associated with temporary heating devices. Some of the common hazards are: burns, fires, explosion, carbon monoxide poisoning, and production of oxygen deficient atmospheres.

1. Each temporary heating device will be inspected prior to operation for any signs of damage and also watched closely during initial operation to be sure that it functions properly.
2. Inspect all gas hoses, piping, fittings, and other connections to insure that they do not have leaks.
3. Make certain there is adequate ventilation where the heater will be used. If a natural supply of fresh air is inadequate, mechanical ventilation will be used.
    - Heaters not suitable for use on wood floors, will not be set directly upon them. If this type heater must be used, it must set on a suitable heat insulating material.
    - The insulating material must extend beyond the heater 24" or more in all directions.

4. Heaters must be placed at least 10 ft. away from combustible canvas, tarpaulins or similar coverings. (Make sure the covering is securely fastened to prevent hazards caused from extreme wind)
5. Heaters will set horizontally level.
6. Solid fuel (cake, coal, and wood) heating devices are prohibited in buildings, on scaffolds, or within 25 feet of any building or structure.
7. Propane fire heaters will not be used in any below grade application.
8. A competent person will continually monitor and maintain temporary heating equipment.
9. Temporary heat will not be used in any confined space.
10. Temporary heating devices must be installed to provide clearance to combustible materials as described in the following table:

Minimum Clearance **Type of Heater**	**Sides**	**Rear**	**Chimney Connector**
Circulating Type Room Heater	*12"*	*12"*	*18"*
Radiant Type Room Heater	*36"*	*36"*	*18"*

WELDING AND CUTTING

1. A fire extinguisher will be within 25' of every Donahue McNamara Steel Oxygen/ Acetylene cart.
2. Cylinders should be in an upright position at all times.
3. A cylinder truck with a steadying device will be used while cylinders are in use.
4. Anti-flashback devices are required by DMS and by OSHA on all oxygen- acetylene units. The anti-flashback devices should be installed between the hoses and regulators. Torches that have built-in anti-flashback devices are acceptable.
5. When hoisting cylinders, they will be secured on a cradle, sling board, or pallet. **NEVER** use valve protection cap for lifting of cylinders.
6. Torches will be lighted by friction lighter (Striker). The use of matches, hot work, or butane lighter to light the torch is **FORBIDDEN**.

7. Proper eye protection will be used when welding and cutting. In welding operations, a flash shield will be used when other employees may be exposed to flash and arc burn.
8. Prior to transporting cylinders, gauges will be removed and valve protection caps will be in place.
9. Cylinders containing oxygen or acetylene or other fuel gas will not be taken into confined spaces.
10. Gauges, torches, and hoses will be inspected at the beginning of each work shift. Defective gauges, torches, and hoses will be taken out of service.
11. At a minimum, the first 10 feet of the cable end which the electrode holder is attached, will be free of repairs or splices. All other cable may be spliced or repaired with rubber and friction tape, or other equivalent insulation.

RIVET REMOVAL PROCEDURE

This Procedure covers the removal of existing rivets. If replacement with high strength bolts is required the specified bolting procedure must be followed. **(1-4)**

1. REMOVE THE HEAD OF THE RIVET

To remove rivet heads use one of three methods:

- Cutting using oxy-fuel equipment
- Grinding off all or part of the head
- Drilling through the center of the rivet head

Oxy-fuel cutting:

Because of the possibility of creating heat affected zones in tension regions of main members and adversely affecting their fatigue life, avoid using oxy-fuel cutting to remove the head except where it is adjacent to:

- Steel that is to be removed and discarded
- Intermediate web stiffeners
- Minor bracing members

Do not allow the flame or molten steel to touch any steel element except those listed above.

For web stiffeners and bracing members where adjacent steel is to remain, take care to minimize flame effects on that steel.

If oxy-fuel must be used take great care to avoid flame effects on adjacent steel. Flame affected steel must be removed by reaming prior to installing the bolt.

Grinding:

- If removing the head by grinding, it is only necessary to remove that portion of the head outside the shank diameter.
- Grind the surface smooth after removing the rivet.

- Use a broaching bit where possible. Position on the center of the domed head and grind away material outside the shank diameter.

Drilling:

- Rivet heads may be removed by drilling along the axis of the rivet using a drill bit larger in diameter than the shank or;
- Centering a roto broach bit with a cutting edge that has an I.D. smaller than the shank and an O.D. larger than the shank of the rivet.

2. REMOVE THE RIVET

- After the rivet head has been removed, force the remainder of the rivet out of the hole by punching or the use of a hydraulic ram.
- The rivet head and shank may be removed in one operation. The drill bit must be slightly larger than the rivet shank. If replacing the rivet with a high strength bolt, the bit size must suit installation.
- If the rivet cannot be removed by the above means, it is permissible to drill a small hole through the rivet and use oxy-fuel to assist in the removal process. This operation must be performed by experienced operators and any flame affected steel must be removed by reaming prior to bolt installation.
- The following techniques using oxy-acetylene or LPG (LPG preferred) are suggested for plates of varying thickness:

For plate thickness combinations up to 1-9/16"

1. Adjust the torch to a neutral flame, using a large gouger or scarfing tip. Use care not to have an oxidizing flame.
2. Heat head of rivet to required temperature (melting point), ensuring no heat application to adjacent members.
3. Carefully flush the rivet head ensuring no gouging of adjacent members.
4. Remove slag using a chipping hammer or chisel.
5. Attempt to knock out the rivet with an appropriate sized punch.

If rivet fails to move, flush opposite head (tail) in accordance with the following steps:

- Heat rivet from one side, using a cutting tip pierce through the rivet. A small hole may be drilled prior to piercing. Hole may be enlarged leaving approximately 1/8" of rivet shank.
- Punch out remainder of rivet

For plate thickness combinations of 1-5/8" and greater:

Simultaneously heat the rivet from both sides prior to piercing.

Note: If scarring occurs it will be necessary to ream the hole before fitting bolts.

3. PREPARE THE HOLE FOR THE BOLT (IF REQUIRED)

Prepare the hole to accept the bolt by reaming out the hole to the required diameter. A grinder may be used to ensure a smooth, level surface on both sides of the hole.

The hole diameter after reaming must be no more than 1/16" larger than the diameter of the bolt to be installed unless a plate washer is to be installed. If a plate washer is to be installed the hole may be up to 3/8" greater than the bolt diameter.

4. INSTALL THE BOLT

- Follow DMS bolting procedure
- Follow RCSC Specification for Structural Joints Using High Strength Bolts

HAND AND POWER TOOLS

While working on a construction project, you will be required to operate and work around power tools and equipment. These tools and equipment must be operated in a safe manner. When assigned to operate a power tool, make sure you are familiar with its safe operation. You may be familiar with safe operating procedures from past experience. However, some equipment will be new or unfamiliar to you. Do not operate it until you have read and understand the operator's manual and a foreman has explained how to use the equipment safely.

1. All hand and power tools will be inspected daily prior to use by the person who will be using them. Tools will be maintained in a safe condition (this includes employee furnished tools).
2. Guards on tools will be in operating condition. Any employee operating tools that require guards will not remove, alter, or in any manner render the guard inoperable. If employee disregards the above requirements, the employee will **IMMEDIATELY** be dismissed from employment.
3. Power operated hand tools will be of the double insulated type or have a ground plug. All tools not double insulated will be used in conjunction with a ground fault circuit interrupter (GFCI).
4. All power cords and power-operated tools will be checked each day prior to use to insure that the cord does not have damaged outer insulation sheath and that the ground pin is in place. The inspection will be completed by the employee using the equipment.
5. All hand held circular saws, table saws, and radial arm saws will be locked out by means of disconnecting the saw from the power source and the male end of the cord tagged or in view of the operator at all times while changing the saw blade.

6. All pneumatic power tools and hoses will be secured by a positive means at each connection.
7. All fuel-powered tools will be stopped and the engines will not be running while refueling is in progress. A fire extinguisher rated not less than 10B will be available for immediate use (within 5'of fueling operation).
8. Only employees with appropriate experience or training will be allowed to operate power tools.
9. Only employees who have received training in powder actuated tool usage and posses a certification card will be allowed to operate powder activated tools.
10. Compressed air hose connection fitting(s) will be safety wired or have wire whips installed prior to use to avoid accidental disconnection.
11. Saw horses or work benches will be used to secure material prior to using hand held saws, grinders, drills, and similar tools. These activities should not be attempted against body parts.

SIGNS, SIGNALS, AND BARRICADES

1. Signs, signals, and\or barricades will be visible at all times that a hazard exists.
2. Signs, signals, and/or barricades will be removed when a hazard no longer exists.
3. Where the general public is exposed to hazards, all signs, signals, and/or barricades will be checked at the start and finish of the work shift.
4. When signs, signals, and\or barricades are removed for short periods of time, a flagman will be posted until signs, signals, and\or barricades are replaced
5. Prior to placing signs, signals, and\or barricades along highway right of way, and the proper authorities will be contacted.
6. Flagmen will wear orange high visibility warning garments while flagging.
7. Flagmen working at night will wear high visibility reflective material garments.
8. When hand signaling by flagman, a red flag at least 15" square or a sign paddle will be used. In darkness, a red light will be used.

JACKING PROCEDURE

In the event that one of DMS Projects should require jacking, DMS will consult with our associate crane operator, Inland Crane of Boise, Idaho and/or our on-call structural engineers, ES2 of Idaho Falls, Idaho.

FALL PROTECTION

IMPORTANT!

DONAHUE-MCNAMARA STEEL REQUIRES FALL PROTECTION AT HEIGHTS OVER 6 FEET UNLESS AUTHORIZED STEEL ERECTION EXCEPTIONS EXIST.

The intent of fall protection is to prevent an employee's exposure to or suffering from an injury due to a fall from elevation. Because of the seriousness of fall injuries, employees must exercise extreme caution when exposed to a fall. If for any reason you are uncomfortable working at heights, notify your Foreman immediately. Use of fall protection systems and equipment is mandatory on Donahue McNamara Steel projects. Any employee found in violation of Donahue McNamara Steel fall protection requirements is subject to immediate termination.

A "Fall Protection System" is a physical means or method of fall protection provided to eliminate a fall exposure 6 feet or greater. This may be accomplished by means of: ladders, scaffolds, lift units, guardrails, static lines, nets, vertical safety lines, retractable lanyards, full body harnesses, standard lanyards, and other fall protection equipment.

Donahue McNamara Steel requires that all fall protection issues on all projects are addressed by the appropriate contractor/subcontractor(s) through thorough analysis and pre-planning before the work begins. Equipment and systems must be designed, outlined and implemented based on the project safety plan to ensure that fall protection is provided to all employees. Any operation exposing an employee to a fall from an elevation of 6 feet or greater must be accompanied by a pre-approved, site-specific, written fall protection plan. The written plan must be fully engineered and detailed with approval by the project superintendent, project manager, or an authorized representative of Donahue McNamara Steel.

Donahue McNamara Steel projects require a positive means of fall protection when the work process exposes employees to a fall hazard of 6 feet or more. Remember that a fall hazard can be above grade or below it. Fall protection must be used when working around openings in the ground that could present a fall hazard. It is also important to remember that it is the responsibility of each subcontractor to train their employees and provide them with effective fall protection.

Any personal fall protection equipment that is subject to in-service loading (it was used to stop a fall) must be removed from service immediately. Fall protection equipment that has

been used to stop a fall will be returned to the manufacturer for re-certification or inspected by a competent person.

All fall protection equipment and Personal Fall Arrest Systems (PFAS) will be inspected daily by a competent person, must meet all OSHA requirements, and must be used according to the manufacturer's recommendations.

Donahue McNamara Steel **requires that all employees must be trained** in the recognition of all fall hazards that they could be exposed to, in the proper use, care and storage of all personal fall protection equipment being used, and/or in the means and/or method that will be utilized to protect them.

Questions regarding fall protection requirements, effectiveness, or systems should be referred to the Donahue McNamara Steel project Foreman/supervisor immediately. For detailed information and requirements, refer to the **OSHA CFR 1926. 500-503 – Fall Protection Standard – Subpart M.**

FLOOR AND OTHER OPENINGS

Floor and roof openings will be covered with materials that are capable of supporting at least twice the weight of the total load that can be expected to be imposed. The cover will be identified by signage that states, "Hole or Cover – Do Not Remove" and secured to prevent accidental displacement. In lieu of a cover, a standard guardrail with toeboard can be installed.

GUARDRAIL SYSTEMS

Employees exposed to a fall of 6 feet or greater and are not protected by a personal fall arrest system (PFAS) or other means of fall protection, must be protected by a standard guardrail system. The guardrail system will consist of a toprail 42 inches high (+/- 3 inches), midrail located midway between the top rail and working level, and toeboard a minimum of 3½ inches high. Guardrail systems must be capable of withstanding, without failure, a force of at least 200 pounds. Vertical posts are to be 8 feet on center maximum. If cable is used as a guardrail system, the cable must be maintained with a maximum of 3 inches of deflection including sag and must be flagged with a high visibility material every 6 feet minimum. **(29CFR 1926.502 (b)**

FALLING OBJECT PROTECTION

Toe boards

1. Erected along the edge of the overhead walking/working surface for a distance sufficient to protect employees below
2. Must be capable of withstanding, without failure, a force of at least 50 pounds applied in any downward or outward direction at any point along the toe board
3. Must be a minimum of 3½ inches in vertical height from their top edge to the level of the walking/working surface with not more than 1/4 inch clearance above the walking/working surface and be solid or have openings not over 1 inch in greatest dimension
4. Where tools, equipment, or materials are piled higher than the top edge of a toe board, paneling or screening shall be erected from the walking/working surface or toe board to the top of a guardrail system's top rail or midrail, for a distance sufficient to protect employees below
5. Guardrail systems, when used as falling object protection, shall have all openings small enough to prevent passage of potential falling objects

ADDITIONAL FALL PROTECTION REQUIREMENTS

1. A full body harness will be worn with a lanyard properly attached to the tie rail when working out of the extendible and articulating boom platforms.
2. A full body harness will be worn by employees working out of suspended scaffolding. Lanyard will be secured to an independent lifeline separated from any line that is attached to the scaffold.
3. Safety nets will be provided when work places are more than 25 feet above the ground or floor where the use of other fall protection devices is impractical.
4. Positioning belts of the two (2) D ring type **WILL NOT** be used for fall protection.
5. All snaphooks shall be double locking and gates face shall be rated for 3600 lbs.

Questions regarding fall protection requirements, effectiveness, or systems should be referred to the Donahue McNamara Steel Safety Director immediately.

For additional fall protection requirements and information, refer to **OSHA Regulations – Subpart M – Fall Protection (1926.500 – 1926.503)**.

RESIDENTIAL FALL PROTECTION

Fall protection requirements for residential construction are set out in **29 CFR 1926.501(b)(13)**. In general, that provision requires conventional fall protection for work at or over six feet. However, **OSHA Instruction STD 3.1** modifies those requirements. It permits employers engaged in certain residential construction activities to use alternative procedures routinely instead of conventional fall protection. No showing of infeasibility of conventional fall protection is needed before using these procedures. A fall protection plan is required but it does not have to be written nor does it have to be specific to the jobsite. Different alternative procedures are specified for different activities.

AVAILABILITY OF ALTERNATIVE PROCEDURES: Alternative procedures are available to employers who are

(1) engaged in residential construction, and

(2) doing one of the listed activities.

Definition of "residential construction"

1) For purposes of this instruction, an employer is engaged in residential construction where the working environment, materials, methods and procedures are essentially the same as those used in building a typical single-family home or townhouse.

2) Residential construction is characterized by:
   (a) Materials: Wood framing (not steel or concrete); wooden floor joists and roof structures.
   (b) Methods: Traditional wood frame construction techniques.

3) In addition, the construction of a discrete part of a large commercial building (not the entire building), such as a wood frame, shingled entranceway to a mall, may fit within the definition of residential construction. Such discrete parts of a commercial building would qualify as residential construction where the characteristics listed above are present.

Listed Activities and Alternative Procedures

There are four groups of residential construction activities for which alternative fall protection plans are available. Each group has its own set of alternative procedures. The groups are:

GROUP 1: Installation of floor joists, floor sheathing, and roof sheathing; erecting exterior walls; setting and bracing roof trusses and rafters.

GROUP 2: Working on concrete and block foundation walls and related formwork.

GROUP 3: This group consists of the following activities when performed in attics and on roofs: installing drywall, insulation, HVAC systems, electrical systems (including alarms, telephone lines, and cable TV), plumbing and carpentry.

GROUP 4: Roofing work (removal, repair, or installation of weatherproofing roofing materials such as shingles, tile and tar paper).

For a complete discussion of fall protection requirements for the residential construction activities listed above, refer to **OSHA Instruction STD 3-0.1A, Interim Fall Protection Compliance Guidelines for Residential Construction.**

SAFETY MONITORING SYSTEMS

Safety monitoring systems [See 1926.501(b)(10) and 1926.502(k)] and their use shall comply with the following provisions:
The employer shall designate a competent person to monitor the safety of other employees and the employer shall ensure that the safety monitor complies with the following requirements:

- The safety monitor shall be competent to recognize fall hazards
- The safety monitor shall warn the employee when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner
- The safety monitor shall be on the same walking/working surface and within visual sighting distance of the employee being monitored
- The safety monitor shall be close enough to communicate orally with the employee
- The safety monitor shall not have other responsibilities which could take the monitor's attention from the monitoring function
- The safety monitor shall not have other responsibilities which could take the monitor's attention from the monitoring function
- No employee, other than an employee engaged in roofing work [on low-sloped roofs] or an employee covered by a fall protection plan, shall be allowed in an area where an employee is being protected by a safety monitoring system
- Each employee working in a controlled access zone shall be directed to comply promptly with fall hazard warnings from safety monitors

SCAFFOLDS

Brace means a rigid connection that holds one scaffold member in a fixed position with respect to another member, or to a building or structure.

Cleat means a structural block used at the end of a platform to prevent the platform from slipping off its supports. Cleats are also used to provide footing on sloped surfaces such as crawling boards.

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

Equivalent means alternative designs, materials or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

Exposed power lines means electrical power lines which are accessible to employees and which are not shielded from contact. Such lines do not include extension cords or power tool cords.

Fabricated decking and planking means manufactured platforms made of wood (including laminated wood, and solid sawn wood planks), metal or other materials.

Fabricated frame scaffold (tubular welded frame scaffold) means a scaffold consisting of a platform(s) supported on fabricated end frames with integral posts, horizontal bearers, and intermediate members.

Failure means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

Guardrail system means a vertical barrier, consisting of, but not limited to, toprails, midrails, and posts, erected to prevent employees from falling off a scaffold platform or walkway to lower levels.

Horse scaffold means a supported scaffold consisting of a platform supported by construction horses (saw horses). Horse scaffolds constructed of metal are sometimes known as trestle scaffolds.

Lower levels means areas below the level where the employee is located and to which an employee can fall. Such areas include, but are not limited to, ground levels, floors, roofs, ramps, runways, excavations, pits, tanks, materials, water, and equipment.

Maximum intended load means the total load of all persons, equipment, tools, materials, transmitted loads, and other loads reasonably anticipated to be applied to a scaffold or scaffold component at any one time.

Mobile scaffold means a powered or unpowered, portable, caster or wheel-mounted supported scaffold.

Open sides and ends means the edges of a platform that are more than 14 inches away horizontally from a sturdy, continuous, vertical surface (such as a building wall) or a sturdy, continuous horizontal surface (such as a floor), or a point of access. Exception: For plastering and lathing operations the horizontal threshold distance is 18 inches.

Outrigger means the structural member of a supported scaffold used to increase the base width of a scaffold in order to provide support for and increased stability of the scaffold.

Platform means a work surface elevated above lower levels. Platforms can be constructed using individual wood planks, fabricated planks, fabricated decks, and fabricated platforms.

Rated load means the manufacturer's specified maximum load to be lifted by a hoist or to be applied to a scaffold or scaffold component.

Scaffold means any temporary elevated platform (supported or suspended) and its supporting structure (including points of anchorage), used for supporting employees or materials or both.

Supported scaffold means one or more platforms supported by outrigger beams, brackets, poles, legs, uprights, posts, frames, or similar rigid support.

Walkway means a portion of a scaffold platform used only for access and not as a work level.

Scaffold Requirements

1. Prior to erection, a competent person shall inspect all scaffold parts and components. Any scaffold component that is defective will be taken out of service.
2. Scaffold components manufactured by different manufacturers may not be intermixed unless the components fit together without force and the scaffold's structural integrity is maintained. Scaffold components manufactured by different manufacturers may not be modified in order to intermix them unless a competent person determines the resulting scaffold is structurally sound.
3. Scaffolds must be erected, moved, dismantled, or altered under the supervision and direction of a competent person. Such activities are to be performed only by experienced and trained employees selected for such work by the competent person.
4. Upon completion of the scaffold erection, a competent person will inspect the scaffold and all its components to insure proper erection.
5. Scaffolds and scaffold components will not be loaded in excess of their maximum intended loads or rated capacities, whichever is less.

6. Scaffolds and scaffold components must be inspected for visible defects by a competent person before each work shift, and after any occurrence that could affect a scaffold's structural integrity.
7. Whenever a scaffold is not in use, place a sign at all access points "**Scaffold out of service**".
8. All supported scaffolds must be erected on footing that is sound, rigid and capable of supporting twice the intended load without settling or displacement.
9. Supported scaffold poles, legs, posts, frames, and uprights must bear on base plates and mud sills or other adequate firm foundation. Unstable objects such as bricks, concrete blocks and similar materials may not be used to support the mud sill or scaffold frames.
10. All scaffolds must be erected plumb and level.
11. Frames must be joined together vertically by coupling or stacking pins or equivalent means.
12. Where uplift can occur which would displace scaffold end frames, the frames or panels must be locked together vertically by pins or equivalent means.
13. Each scaffold platform or walkway must be a minimum of 18 inches wide.
14. No ramp or walkway may be inclined more than a slope of one (1) vertical to three (3) horizontal (20 degrees above the horizontal).
15. Work platforms between 4 feet and 10 feet in height must be a minimum of 45 inches horizontally in both directions.
16. Each platform on all working levels of scaffolds must be fully planked or decked between the front uprights and the guardrail supports as follows:
    - Each platform unit is to be installed so that the space between adjacent units and the space between the platform and the uprights is no more than 1 inch wide, except if it can be demonstrated that a wider space is necessary (for example, to fit around uprights when side brackets are used to extend the width of the platform). The platform must be planked or decked as fully as possible and the remaining open space between the platform and the uprights may not exceed 9½ inches.
17. All scaffold planks must be scaffold grade or equivalent. Any scaffold planks that are damaged will be taken out of service immediately.
18. All planking of platforms must be overlapped over a support a minimum of **12 inches** and/or be secured from movement.
19. Scaffold planks must extend over their end supports by a minimum of **6 inches** and maximum of **12 inches**.

20. Safe access must be provided to all scaffold work platforms. When access to scaffold is greater than **2 feet** from ground or access to a work platform is greater than **2 feet**, a portable or attachable ladder, or another acceptable means of access must be provided. (The ladder must extend 3 feet beyond the level being accessed and be secured.)

21. Climbing on scaffold cross braces is **STRICTLY PROHIBITED**.

22. Each employee on a scaffold more than **10 feet** above a lower level must be protected from falling to that lower level.

23. Guardrail systems must be installed along all open sides and ends of platforms and meet the following requirements:

- **Top rails** must be installed between **38 inches** and **45 inches** above the work platform with midrails approximately midway between.
- **Cross bracing** is acceptable in place of a **midrail** when the crossing point is between **20 inches** and **30 inches** above the work platform.
- **Cross bracing** is acceptable in place of a **top rail** when the crossing point is between **38 inches** and **48 inches** above the work platform.
- Each **top rail** must be capable of withstanding, without failure, a force of at least **200 lbs** and each midrail must withstand **150 lbs**.

24. The clearance between scaffolds and power lines shall be as follows: Scaffolds shall not be erected, used, dismantled, altered, or moved such that they or any conductive material handled on them might come closer to exposed and energized power lines than as follows:

Insulated Lines

Less than 300 volts	3 feet
300 volts to 50 kV	10 feet
More than 50 kV	10 feet + 0.4 inches for each 1 kV over 50 kV

Uninsulated Lines

Less than 50 kV	10 feet
More than 50 kV	10 feet + 0.4 inches for each 1 kV over 50 kV

If there is ever any doubt or confusion about scaffolds and power lines, contact the power company.

25. All employees working on or around a scaffold must wear a hardhat.

26. Toeboards must be a minimum of **3½ inches** high and installed to protect employees where falling objects are a hazard.

27. Where there is a danger of tools, material or equipment falling from a scaffold and striking employees below, the area below the scaffold must be barricaded.

28. Debris will not be allowed to accumulate platforms.

29. Makeshift devices (buckets, boxes, barrels, etc.) will not be used on scaffold platforms to increase the height of the working level.

30. Ladders will not be used on scaffold platforms to increase the height of the working level. (Exception: large area scaffold and must meet criteria outlined in OSHA Regulations – Subpart L - 1926.451(f)(15)(i-iv))

31. To help control movement and prevent tipping, scaffolds greater than 3 feet wide with a height to base width ratio greater than 4:1 must be secured to the structure at each end and at intervals not to exceed **30 feet** horizontally and **26 feet** vertically. Scaffolds 3 feet wide or less with a height to base width ratio greater than 4:1 must be secured to the structure at both ends and at intervals not to exceed **30 feet** horizontally and **20 feet** vertically.

32. The use of shore or lean-to scaffold is prohibited.

33. Mobile Scaffolding will meet the following requirements:

    - The height of free-standing towers will not exceed Four Times the minimum base dimension.
    - All casters will be equipped with positive locking devices and in the locked position when employees are on the working platform.
    - Mobile scaffolds must have all cross braces in position including a horizontal diagonal brace.
    - Employees will be allowed to remain on a mobile scaffold when the scaffold is being moved only if OSHA requirements are followed. (Refer to OSHA Regulations – Subpart L - 1926.452(w)(2), (3), (6) and (10) for requirements)
    - All working levels must be fully planked, no matter what the height of the work platform.

34. Horse scaffolds will meet the following requirements:

    - Scaffold work surface must be a minimum of 18 inches wide and of scaffold grade plank material.
    - Scaffolds may not to be constructed or arranged more than two (2) tiers or 10 feet in height, whichever is less.
    - When horses are arranged in tiers, each horse will be placed directly over the horse in the tier below.

- When horses are arranged in tiers, the legs of each horse will be nailed down or otherwise secured to prevent displacement.
- When horses are arranged in tiers, each tier shall be cross braced.

35. Each employee who performs work while on a scaffold must be trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training must include the following areas, as applicable:

    - The nature of any electrical hazards, fall hazards and falling object hazards in the work area.
    - The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used.
    - The proper use of the scaffold, and the proper handling of materials on the scaffold.
    - The maximum intended load and the load-carrying capacities of the scaffolds used.

36. Each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold must be trained by a competent person to recognize any hazards associated with the work in question. The training must include the following topics, as applicable:

    - The nature of scaffold hazards.
    - The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in question.
    - The design criteria, maximum intended load-carrying capacity and intended use of the scaffold.

For additional scaffold requirements and information, refer to **OSHA Regulations – Subpart L – Scaffolds (1926.450 – 1926.454)**.

STAIRWAY AND LADDERS

Stairways and ladders are used frequently on construction projects and are intended to provide safe access to elevated work surfaces or to work at elevations. When used

correctly, they are safe and efficient. Incorrect use of the equipment can cause serious injury. It is important to plan ahead and select the correct type of equipment for the job.

Stairways

1. A stairway or ladder must be provided at all personnel points of access where there is a break in elevation of **19 inches** or more and no ramp, runway, or sloped embankment is provided.
2. When only one point of access between levels is provided, the access area must be kept clear at all times.
3. All metal pan landings and metal pan treads will be filled with concrete, wood, or other solid materials prior to being used.
4. Stairways having 4 or more risers or rising more than **30 inches**, whichever is less, must be equipped with at least one handrail and one stair rail system along each unprotected side or edge.
5. The height of stair rails will be not less than **36 inches** from the top of the stair rail to the surface of the tread in line with the riser.
6. Handrails that will not be a permanent part of the structure must have a minimum clearance of 3 inches.
7. Midrails must be provided midway between the top of the stair rail system and the stairway steps.
8. Unprotected sides and edges of stairway landings will be protected with guardrail systems.

Ladders

General Requirements:

1. Ladders must be capable of supporting the following loads without failure:
   - Each portable ladder: At least 4 times the maximum intended load
   - Each extra-heavy-duty type 1A metal or plastic ladder: At least 3.3 times the maximum intended load.
2. Ladder rungs, cleats, and steps must be parallel, level, and uniformly spaced when the ladder is in position for use.
3. Rungs, cleats, and steps of portable ladders must be spaced not less than 10 inches apart, nor more than 14 inches apart.

4. The minimum clear distance between side rails for all portable ladders must be 11½ inches.
5. A metal spreader or locking device must be provided on each stepladder to hold the front and back sections in an open position when the ladder is being used.
6. Wood ladders may not be coated with any opaque covering, except for identification or warning labels which may be placed on one face only of a side rail.
7. Job-built wooden ladders must have wooden spacer blocks installed between each rung. This includes the bottom rung. DO NOT cut into the side rail to receive the ladder rung.

Ladder Use

1. When portable ladders are used for access to an upper level, they must extend 3 feet beyond the level being accessed and secured.
2. An extension ladder must be supported by another person at the base until it is secured at the top.
3. Extension or straight ladders must be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder. (*If you stand with your toes at the bottom of the ladder and extend your arms out horizontally they should touch a rung. This is a practical way to establish the one to four ratio.)*
4. Ladders must be maintained free of oil, grease, and other slipping hazards.
5. Ladders may not be loaded beyond the maximum intended load or beyond the manufacturer's rated capacity.
6. Ladders must be used only for the purpose for which they were designed.
7. Ladders must be used only on stable and level surfaces unless secured to prevent accidental displacement.
8. Ladders must not be used on slippery surfaces unless secured.
9. Ladders placed in any location where they can be displaced by workplace activities must be secured to prevent accidental displacement or barricaded.
10. The area around the top and bottom of the ladder must be kept clear.
11. Ladders may not be moved, shifted, or extended while occupied.
12. Ladders must have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized equipment.
13. The top or top step of a stepladder may not be used as a step.

14. Cross-bracing on the rear section of stepladders may not be used for climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections.
15. Each employee using a portable ladder must inspect that ladder prior to use.
16. 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.
17. Portable ladders with structural defects must either be immediately marked in a manner that readily identifies them as defective, or be tagged with "Do Not Use" or similar language, and must be withdrawn from service until repaired.
18. Ladder repairs must restore the ladder to a condition meeting its original design criteria, before the ladder is returned to use.
19. When ascending or descending a ladder, the user must face the ladder.
20. Each employee must use at least one hand to grasp the ladder when progressing up and/or down the ladder.
21. An employee must not carry an object or load that could cause the employee to lose balance and fall.

The following rules must be followed by all employees when placing, ascending or descending ladders:

- Use the *three points of contact* rule when going up or down a ladder. If material must be handled, raise or lower it with a rope either before going down or after climbing to the desired level.
- An extension ladder must be supported by another person at the base until it is secured at the top.
- Always face the ladder when ascending or descending.
- Never slide down a ladder.
- Be sure shoes are not greasy, muddy, or slippery before climbing.
- Carry tools in a tool belt, not in the hand.
- Never lean too far to the sides. Keep your belt buckle within the side rails.
- Use a 4 to 1 ratio when leaning a straight or extension ladder and never climb higher than the third rung from the top.
- If a straight or extension ladder is being used to access another working level, the side rails must extend 3 feet beyond the access point and the ladder must be secured.
- Be sure that a stepladder is fully open and the metal spreader locked before starting to climb.
- Never stand on the top step or the top of a stepladder.

- A stepladder is a work platform and not to be used for access to another working surface.
- Inspect each ladder for defects before using.
- Never use a defective ladder. Tag or mark it so that it will be repaired or destroyed.
- Never splice or lash ladders together.
- Never use makeshift ladders, such as cleats fastened across a single rail.
- Keep ladders clean and free from dirt and grease.
- Never use ladders during a strong wind except in an emergency and then only when they are securely fastened.
- Never attempt to adjust a ladder while a user is standing on the ladder.
- Never jump from a ladder. Always dismount from the bottom rung.

Training

Each employee must receive training by a competent person in the following areas:

- The nature or fall hazards.
- The proper construction, use, placement, and care in handling of all stairways and ladders.
- The maximum intended load carrying capacity of ladders.
- Intended purposes of ladders.
- The contents of **1926 Subpart X**.

Ladder Ratings

There are many types of portable ladders, but they all receive one of four ratings, based on their maximum working load (the maximum weight they can safely support).

Rating	**Working Load**
Extra heavy duty (I-A)	300 pounds
Heavy duty (I)	250 pounds
Medium duty (II)	225 pounds
Light duty (III)	200 pounds

Before you use a ladder, check its rating. And be sure not to subject it to a load greater than its rated capacity.

For additional stairway and ladder requirements and information, refer to **OSHA Regulations – Subpart X – Stairways and Ladders (1926.1050 – 1926.1060)**.

AERIAL LIFTS

Anytime aerial lifts, including: (1) extensible boom platforms, (2) aerial ladders, (3) articulating boom platforms, (4) vertical towers, or (5) a combination of any such devices, are used to elevate employees to job-sites above ground, the following safety rules will apply:

- No aerial lift this company owns or uses will be 'field modified' for uses other than those intended by the manufacturer unless: (1) the manufacturer certifies the modification in writing, or (2) any other equivalent entity, such as a nationally recognized testing lab, certifies the aerial lift modification conforms to all applicable provisions of ANSI A92.2-1969, and the OSHA rules at 1926.453. The lift must be at least as safe as the equipment was before modification.
- Operators shall test all controls and functions before use.
- Operators shall inspect all Aerial lifts before each shift.
- 100% tie off personal fall arrest fall protection is required in aerial lifts that have rotating, articulating or extending booms. Use the approved tie off point inside the basket.
- All operators shall be trained before using aerial lifts and the training must involve reading the operators manual.
- Always stand firmly on the floor of the basket, never sit or climb on the edge of the basket. Never use planks, ladders, or other devices for a work position.
- Never exceed boom and basket limits specified by the manufacturer.

ELECTRICAL

It is the goal of Donahue McNamara Steel to assure that all temporary electrical equipment is maintained in a safe working condition to prevent electrical shock or fire. (By temporary electrical equipment, Donahue McNamara Steel means extension cords, electrical power tools, temporary breaker boxes on a construction site, temporary string lights, and etc.).

1. Ground fault circuit interrupters **(GFC**I) will be used on all temporary electrical **15 and 20 amp 120 volt**; this includes cord sets that are plugged into permanent building outlets.
2. The GFCI system will be checked on a monthly basis and will be recorded on Foreman daily report.
3. All equipment to be used on the construction site will be tested!
    - All equipment will be tested before first use for grounding and continuity of the circuitry.

- Equipment returned to service following repairs will be tested for continuity before being used.
- All equipment will be tested after an event that might have caused damage. (e.g. Fire, vehicular travel over cord)

4. All breaker panels will be labeled on the outside cover with the voltage.
5. Each breaker will be numbered with a corresponding number of the receptacles it controls.
6. Extension cords will be of the three-wire type and will be designed for hard or extra hard use.
7. Extension cords will be visually inspected each day prior to use for:
    - Missing ground pin.
    - Cuts in outer insulation.
    - Proper strain relief at male and female fittings.
8. All lamps will be protected from accidental contact by protective covers.
9. Temporary lights will not be suspended by their cords unless the cord and light is designed for this means of suspension.
10. Electrical tools will be inspected each day prior to being put into service.
11. When pull boxes, switchboards, and panel boards become energized, they will be equipped with covers or the area will be secured so only qualified persons will have access.
12. Where cord sets are routed through floor holes, wall holes, doorway, or where subject to vehicular traffic, the cord set will be protected from damage by bushing or fittings that will eliminate the possibility of damage.
13. All 4-way and 2-way electrical boxes used in conjunction with temporary electrical will be UL approved. Job boxes are **PROHIBITED**.

For additional electrical requirements and information, refer to **OSHA Regulations – Subpart K – Electrical (1926.400 – 1926.449)**.

EXCAVATIONS AND TRENCHING

The purpose of trenching and excavation procedures is to prevent an injury or incident from occurring during this work process.

1. Prior to starting any excavation, the following **WILL** be done:
    a. Contact local one call system and/or affected utility company.

b. Locate and identify all underground utilities on the project. This should be coordinated with local utility agencies and/or district representatives.

   Note: If at any time unidentified or non-located utilities are found, stop all work immediately and contact the Donahue McNamara Steel Foreman.

c. Insure that competent person is on site (if an excavation is part of subcontractor's work, secure name of competent person).

d. Determine protective system method to be used.

e. If shoring method other than outlined in 1926 Subpart P is to be used:

f. A registered engineer must design the shoring system.

g. A copy of the engineer designed and stamped drawings must be kept on site.

h. If available, consult boring log in contract documents to help establish soil type.

i. Complete Excavation Checklist. (Appendix 23.1)

j. If ground water is encountered, have equipment available for water removal.

k. Where possible, divert water run-off to keep from entering the excavation.

2. All surface encumbrances that create a hazard will be removed or supported prior to starting the excavation.
3. Where the stability of adjoining buildings, walls, or other structures is endangered by excavation operations, support systems such as shoring, bracing, or underpinning shall be provided to ensure the stability of such structures for the protection of employees.
4. Spoil piles and other materials must be kept 2 feet from the edge of the excavation.
5. A daily inspection of the excavation will be made and documented. Establish a daily inspection procedure and procedures for inspecting excavation after rain or any change in site conditions
6. Each employee working in or near an excavation will be trained in the recognition of the hazards associated with excavations.
7. A stairway, ladder, ramp, or other safe means of egress will be located in trench excavations that are 4 feet or more in depth so as to require no more than 25 feet of lateral travel for employees.
8. When excavations exceed 5 feet in depth, each employee or person in the excavation will be protected from cave-ins by an adequate protective system design. (Protective system designs include: 1. shoring, 2. sloping, 3. benching, and 4. shielding).
9. Donahue McNamara Steel projects require a positive means of fall protection when the work process exposes employees to a fall hazard of more than 6 feet. Remember that a fall hazard can be above or below grade. Fall protection must be used when working around trenching and excavation where a fall hazard exists.

10. Walkways must be provided where employees or equipment are required or permitted to cross over excavations. A guardrail system must be provided where walkways are 6 feet or more above lower levels.
11. Where oxygen deficiency (atmospheres containing less than 19.5 percent oxygen) or a hazardous atmosphere exists or could reasonably be expected to exist, the atmospheres in the excavation must be tested before employees enter excavations greater than 4 feet in depth.

For additional excavation requirements and information, refer to **OSHA Regulations – Subpart P – Excavations (1926.650 – 1926.652).**

CRANES

The intent of crane safety procedures is to insure all crane operations are per-formed in a safe manner. All crane work must be pre-planned to assure the safety of the process.

It is the responsibility of Donahue McNamara Steel and/or the crane equipment supplier to assure any crane used on a Donahue McNamara Steel project is in a safe working condition. All cranes must comply with all applicable state or federal safety and health standards.

On-Site documentation must be supplied with the crane and received by project management prior to any work by the crane on the job. Documentation required:

1. The manufacturer's O&M requirements and specifications will be followed.
2. The crane complies with all applicable state, federal or special requirements of the project.
3. Operator's manual must be available in the cab of the crane.
4. A copy of the cranes annual inspection is to be on file at the site at all times.
5. The annual inspection will be by a person qualified to inspect and certify cranes.
6. The operator's view of the load charts will not be obstructed at any time.
7. Inspection logs for daily, weekly and monthly work are available in the crane cab for inspection.
8. Only certified operators will be allowed to operate cranes.
9. Special permission, in the form of a "lift plan", is required for any lift that exceeds 75 percent of the rated capacity of the crane in the pick condition. (This is not applicable for mobile cranes equipped with operating computer systems or tower cranes with operating limit switches.)
10. Prior to the on-site arrival of the crane, insure that any electrical lines that will be in the working area are de-energized or insulated. Whenever possible lines should be relocated.

11. A daily inspection will be performed at the start of each shift and recorded on crane daily inspection log.
12. At no time will a crane be operated with computer systems or limit switches in a non-functioning or override condition.
13. The operator has the responsibility and authority to cease operation whenever an unsafe condition exists. The Foreman will be "Immediately" contacted when this occurs.
14. Prior to all picks, the weight of the load must be known and the load chart consulted.
15. All outriggers must be fully extended and set on stable ground. Avoid setting outrigger pads on backfilled area. Any cribbing under outrigger is to be tightly planked.
16. The swing radius of the counter weight is to be barricaded prior to start of crane operation.
17. No alterations are to be made to any part of the crane without the written authorization of the crane manufacturer. Any structural repairs or modifications will meet the manufacturer's requirements and be inspected and re-certified.
18. Pick and carry operations are to be avoided if possible.
19. Cranes, rigging and loads are not permitted within 10 feet of high voltage power lines (50,000 volts or less). For lines over 50,000 volts, minimum clearance will be 10 feet plus 0.4 inch for each 1,000 volts. Any operations that will approach the 10 foot minimum must be re-planned to include calls to the local power company. At that time a request to have those power systems which are in close proximity reduced to the "one shot" mode.

The hoisting of personnel will be done only when all the requirements of **CFR 1926.550** (suspended personnel platforms) have been met.

Due to the seriousness of crane safety procedures, any operator or Foreman who violates these procedures will be subject to immediate disciplinary action, up to and including termination.

RIGGING

1. All rigging and hardware will be selected to safely handle the weight of the load.
2. Rigging is to be inspected daily. All defective rigging is to be red tagged and taken out of service.
3. Only personnel who are experienced will be allowed to perform rigging tasks.
4. Rigging will be stored in a manner that will protect the rigging from damage.
5. Both the weight of the load and the center of gravity will be known prior to the lift being performed. Accurately weigh the load before any pick.
6. Tag lines are to be attached to all loads. Tag lines should be made of non- conductive material and be at least ten (10) feet long and be well secured to the load.
7. Multiple lift rigging will comply with **OSHA 29 CFR 1926.753(e).**
8. Rigging used in conjunction with suspended personnel platforms are not to be used for any other purpose.
9. An erection plan will be made prior to all critical lifts and kept on the job site.

For additional crane requirements and information, refer to **OSHA Regulations – Subpart N – Cranes, Derricks, Hoists, Elevators, and Conveyors (1926.550 – 1926.555)**.

MULTIPLE LIFT RIGGING PROCEDURE

Multiple lifts shall only be performed if the following criteria are met:

1) Employees involved must be trained in this procedure
2) Cranes used in multiple lift operations must not have a free fall feature
3) Multiple lift rigging assemblies “chimes” with a designed safety factor of 5 to 1 must be used
4) Only similar members (e.g. shape, length, weight) are lifted in one pick
5) A maximum of four members to be hoisted per lift
6) Members to be rigged from the top down
7) Members shall be attached at their center of gravity
8) Members shall be rigged at least seven feet apart
9) Members shall be placed from the bottom up
10) The total load shall not exceed 75% of the crane’s rated capacity
11) The total load shall not exceed the rigging capacity

CRITICAL LIFT PLAN AND PRE-ENGINEERED LIFT PROCEDURE

A Critical Lift Plan and a Pre-engineered Lift Procedure consist(s) of as many drawings, specifications, and procedures as necessary to accurately assess all important load factors and site factors relating to a Critical Lift. These items are included as a guide, but should not be interpreted as being all-inclusive in the analysis and preparation of a Critical or Pre-engineered Lift. Sound engineering and planning is still the responsibility of the cognizant engineer and/or project manager associated with the lift. The exhibit Checklist for Lift Planning summarizes those factors. Most lifts, however, even some Critical Lifts, do not involve all of the factors listed there.

The lift plan for a Pre-engineered Lift must be a Department/Division procedure, subject to the review, approval, and record management policies of the Department/Division. This includes the signed reading acknowledgement for individuals performing the actions of the procedure, specifically the Person-in-charge (PIC) of the lift and the crane operator. The elements required for a Critical Lift Plan also are required for a Pre-engineered Lift Procedure (lift plan).

The following is the minimum level of information required for completing an adequate lift plan:

Elevation View Drawing of the crane, load, and any nearby structures, which could cause interference. This drawing must be made to scale and should note:

- Crane manufacturer(s), model(s), and counterweight(s) if variable.
- Boom length(s) and lifting radius(i).
- Maximum load elevation during lifting procedure.
- Any jibs or special lifting devices required.
- Minimum number of parts of crane hoist line required for lifting the load.
- All required slings, shackles, and other rigging components identified by capacity, size, length, and location.
- Calculated center of gravity of load.

Plan View Drawing of the crane, load, and nearby structures, which could cause interference. This drawing must be made to scale and should note

- Route that transport will take to position the load for lifting.
- Initial lifting position of the load including radius. Lifting radius must be accurately determined.
- Final placement position of the load including radius. Lifting radius must be accurately determined. Location of the crane(s) including tail swing limits.
- Route that crane(s) will take if walking with the load, as well as associated matting requirements.

- Any utilities located within the work zone. Underground facilities – piping, ducts, etc. – must be accurately located.
- Space may be needed to assemble crane.
- Planning must include load transportation considerations, e.g., how to get the load close enough to the crane. This may be a function of the type of crane being used, for example some cranes perform better in certain sectors (quadrants) of operation than others.

Lift Analysis including

- Tabulation of the gross load weight, including the weight of all blocks and rigging tackle.
- Rigging attachment points and special rigging requirements.
- Gross rated capacity of the crane in the configuration specified.
- Calculation of the percentage of the crane's rated capacity at which the lift will be made.
- Crane-imposed soil loads must be determined. Soil analysis may be needed to verify crane-imposed loads can be safely supported.
- Allowable weather conditions for the lift and the effect of wind loading.
- Sequence of work, including lift-off, steady state conditions, and set-down of load (including positions where there is a shift in the location of the center of gravity, for the pick points).

  All potential complicating issues for any lifts must be addressed in the lift plan. However, for a relatively simple operation the above items can provide sufficient information and even be organized onto one drawing.

EQUIPMENT AND MOTOR VEHICLES

1. Upon delivery, each piece of equipment will be checked to insure all safety features are operating properly. If a deficiency is found, equipment will be red tagged, "Out of Service", until repairs are made and equipment is re-checked. This applies to all company-owned, rented, and subcontractor's equipment.
2. All equipment with reverse gears will be equipped with a back-up alarm.
3. A fire extinguisher is to be mounted on each vehicle.
4. A First-Aid Kit is to be mounted in every vehicle.
5. At the beginning of each shift, the operator will check equipment prior to putting into service. Documentation of this check is required.
6. Seatbelts will be worn by all operators of equipment and motor vehicles.
7. Seatbelts will be worn by all passengers being transported in authorized motor vehicles.

8. All equipment that is fitted with Roll Over Protection (ROPS) will be equipped with seatbelts.
9. Riding on equipment by an employee other than the operator is PROHIBITED.
10. All operators of company-owned, hired or rented motor vehicles must have a valid, appropriate driver's license.
11. All forklift operators will be trained and carry certification of training.

Equipment Checklist

- Service brakes – including trailer brake connections
- Brakes and hand brake
- Horn and back-up alarm
- Operating controls and steering mechanism
- Tires, rims and lug nuts
- Seatbelt(s) and all safety devices
- Lights, reflectors, windshield/wipers, and fire extinguisher

For additional equipment and motor vehicle requirements and information, refer to **OSHA Regulations – Subpart O – Motor Vehicles and Mechanized Equipment (1926.600 – 1926.606)**.

POWERED INDUSTRIAL TRUCK FORKLIFT TRAINING REQUIREMENTS

Operator training

Ensure that each powered industrial truck operator is competent to operate a powered industrial truck safely, as demonstrated by the successful completion of the training and evaluation.

Prior to permitting an employee to operate a powered industrial truck (except for training purposes), each operator has successfully completed the required training.

Training program implementation

Trainees may operate a powered industrial truck only:

- Under the direct supervision of persons who have the knowledge, training, and experience to train operators and evaluate their competence; and
- Where such operation does not endanger the trainee or other employees.

Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), practical training

(demonstrations performed by the trainer and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace.

All operator training and evaluation shall be conducted by persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.

Training program content

Powered industrial truck operators shall receive initial training in the following topics, except in topics which Donahue McNamara Steel can demonstrate are not applicable to safe operation of the truck in the employer's workplace.

Truck-related topics:

- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate
- Differences between the truck and the automobile
- Truck controls and instrumentation: where they are located, what they do, and how they work
- Engine or motor operation
- Steering and maneuvering
- Visibility (including restrictions due to loading)
- Fork and attachment adaptation, operation, and use limitations
- Vehicle capacity
- Vehicle stability
- Any vehicle inspection and maintenance that the operator will be required to perform
- Refueling and/or charging and recharging of batteries
- Operating limitations
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

Workplace-related topics:

- Surface conditions where the vehicle will be operated
- Composition of loads to be carried and load stability
- Load manipulation, stacking, and unstacking
- Pedestrian traffic in areas where the vehicle will be operated
- Narrow aisles and other restricted places where the vehicle will be operated
- Hazardous (classified) locations where the vehicle will be operated
- Ramps and other sloped surfaces that could affect the vehicle's stability
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust

- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation

Refresher training and evaluation

Refresher training, including an evaluation of the effectiveness of that training, shall be conducted to ensure that the operator has the knowledge and skills needed to operate the powered industrial truck safely.

Refresher training in relevant topics shall be provided to the operator when:

- The operator has been observed to operate the vehicle in an unsafe manner
- The operator has been involved in an accident or near-miss incident
- The operator has received an evaluation that reveals that the operator is not operating the truck safely
- The operator is assigned to drive a different type of truck
- A condition in the workplace changes in a manner that could affect safe operation of the truck

An evaluation of each powered industrial truck operator's performance shall be conducted at least once every three years.

Avoidance of duplicative training

If an operator has previously received training in a topic specified, and such training is appropriate to the truck and working conditions encountered, additional training in that topic is not required if the operator has been evaluated and found competent to operate the truck safely.

Certification

The certification shall include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training or evaluation.

CONCRETE

1. All reinforcing steel that an employee could fall onto or into (this includes horizontal steel) will have protective caps or an equivalent means of guarding.
2. No employee will be allowed to place or tie reinforcing steel more than six feet above a work surface unless proper fall protection is used.
3. All reinforcing steel will be braced in a manner to prevent overturning and collapse.
4. All manually guided rotating type powered concrete trowel machines will be equipped with a control switch that will automatically shut off when hands are removed from the machine.

5. Where bull float handles could come in contact with energized electrical conductors, the handle will be constructed of non-conductive material.
6. A copy of drawings or plans for jack layout, formwork, working decks, and scaffolding will be maintained at the job site.
7. Erected shoring will be inspected prior to, during, and immediately after concrete placement.
8. All vertical formwork will be braced in a manner to prevent overturning and collapse. The practice of using wire tied to reinforcing steel will not be considered adequate bracing.
9. During post-tension operations, only employees who are essential to jacking operations will be permitted behind the jacks.
10. Form removal will not be done until the concrete has gained sufficient strength to support its weight and superimposed loads.
11. Only employees required for erection of pre-cast members are permitted in the area of erection.

Additional requirements for concrete construction - refer to **CFR 29 Part 1926 Subpart Q**.

MASONRY

1) Prior to the start of masonry walls, a limited access zone will be established.
   a) The limited access zone will be the height of the wall plus 4 feet.
   b) Limited access zone will run the full length of the wall being erected.
   c) Limited access zone will be on the scaffolded and un-scaffolded side of the wall.
   d) Only employees who are actively engaged in the construction of the wall are permitted to enter the limited access zone.
   e) Limited access zone will remain in place until the wall is adequately braced.
2) All masonry walls over 8 feet high will be adequately braced to prevent overturning or collapse.
3) Concrete mixers will be equipped with guards on all moving parts.
4) At no time will an employee attempt to clean out the hopper until the power to the equipment has been shut off.
5) Empty concrete sacks will be disposed of immediately.
6) Mixer operator will wear proper personal protective equipment while performing mixer operations.
7) Employees operating masonry saws will be guarded with a semi-circular enclosure over the blade. The operator will wear safety glasses and a face shield.
8) The motor frames on all stationary saws will be grounded.

9) Brick stacks will not exceed 7 feet in height. Taper back 2 inches per foot after 4 feet.
10) CMU blocks stacked higher than 6 feet will be tapered back ½ block per tier above the 6-foot level.

For additional concrete and masonry requirements and information, refer to **OSHA Regulations – Subpart Q – Concrete and Masonry Construction (1926.700 – 1926.706)**.

STEEL ERECTION

Steel erection activities include hoisting, laying out, placing, connecting, welding, burning, guying, bracing, bolting, plumbing and rigging structural steel, steel joists and metal buildings; installing metal decking, curtain walls, window walls, siding systems, miscellaneous metals, ornamental iron and similar materials; and moving point-to-point while performing these activities.

Commencement of Steel Erection – A steel erection contractor shall not erect steel unless it has received written notification that the concrete in the footings, piers and walls or the mortar in the masonry piers and walls has attained, on the basis of an appropriate ASTM standard test method of field-cured samples, either 75 percent of the intended minimum compressive design strength or sufficient strength to support the loads imposed during steel erection.
Site Layout – Donahue McNamara Steel or the controlling contractor shall ensure that the following is provided and maintained:

- Adequate access roads into and through the site for the safe delivery and movement of cranes, trucks, other necessary equipment, and the material to be erected and means and methods for pedestrian and vehicular control.

- A firm, properly graded, drained area, readily accessible to the work with adequate space for the safe storage of materials and the safe operation of the erector's equipment.

Pre-planning of Overhead Hoisting Operations – All hoisting operations in steel erection shall be pre-planned to ensure that the all hoisting and rigging requirements are met.
Site-specific Erection Plan – Due to conditions specific to the site, steel erection contractors are required to develop a site-specific steel erection plan that outlines the means and methods that provide employee protection. The site-specific erection plan shall be developed by a qualified person and be available at the work site before erection begins.
Fall Protection – Each employee engaged in a steel erection activity that is on a walking/working surface with an unprotected side or edge more than **15 feet** above a lower level shall be protected from fall hazards by guardrail systems, safety net systems, personal

fall arrest systems, positioning device systems or fall restraint systems. Each connector shall be protected from fall hazards of more than two stories or **30 feet** above a lower level, whichever is less.

Falling Object Protection – All materials, equipment, and tools, which are not in use while aloft, shall be secured against accidental displacement. The controlling contractor shall bar other construction processes below steel erection unless overhead protection for the employees below is provided.

Controlled Decking Zones – A controlled decking zone may be established in that area of the structure over **15 and up to 30 feet** above a lower level where metal decking is initially being installed and forms the leading edge of a work area. In each CDZ, the following shall apply:

- Each employee working at the leading edge in a CDZ shall be protected from fall hazards of more than two stories or **30 feet** (9.1 m), whichever is less.
- Access to a CDZ shall be limited to only those employees engaged in leading edge work.
- The boundaries of a CDZ shall be designated and clearly marked. The CDZ shall not be more than 90 feet (27.4 m) wide and 90 (27.4 m) feet deep from any leading edge. The CDZ shall be marked by the use of control lines or the equivalent. Examples of acceptable procedures for demarcating CDZ's can be found below.
- Each employee working in a CDZ shall have completed CDZ training in accordance with § 1926.761 (see below).
- Unsecured decking in a CDZ shall not exceed 3,000 square feet.
- Safety deck attachments shall be performed in the CDZ from the leading edge back to the control line and shall have at least two attachments for each metal decking panel.
- Final deck attachments and installation of shear connectors shall not be performed in the CDZ.

CDZ (Non-Mandatory) Procedures - When used to control access to areas where leading edge and initial securement of metal deck and other operations connected with leading edge work are taking place, the controlled decking zone (CDZ) is defined by a control line or by any other means that restricts access. Only authorized and trained personnel shall access the CDZ and signs should be posted accordingly. A control line for a CDZ is erected not less than 6 feet (1.8 m) nor more than 90 feet (27.4 m) from the leading edge. Control lines extend along the entire length of the unprotected or leading edge and are approximately parallel to the unprotected or leading edge. Control lines consist of ropes, wires, tapes, or equivalent materials, and supporting stanchions as follows: each line is rigged and

supported in such a way that its lowest point (including sag) is not less than 39 inches (1.0 m) from the walking/working surface and its highest point is not more than 45 inches (1.3 m) from the walking/working surface. Each line has a minimum breaking strength of 200 pounds (90.8 kg).

Training Requirements for Steel Erection – Training required by this section shall be provided by a qualified person(s). The employer shall provide a training program for all employees exposed to fall hazards. The program shall include training and instruction in the following areas:

- The recognition and identification of fall hazards in the work area;
- The use and operation of guardrail systems (including perimeter safety cable systems), personal fall arrest systems, positioning device systems, fall restraint systems, safety net systems, and other protection to be used
- The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used
- The procedures to be followed to prevent falls to lower levels and through or into holes and openings in walking/working surfaces and walls; and
- The employer shall ensure that each employee who performs multiple lift rigging has been provided training in the following areas: the nature of the hazards associated with multiple lifts; and the proper procedures and equipment to perform multiple lifts required by § 1926.753(e).
- The employer shall ensure that each connector has been provided training in the following areas: the nature of the hazards associated with connecting; and the establishment, access, proper connecting techniques and work practices required by § 1926.756(c) and § 1926.760(b).
- Where CDZs are being used, the employer shall assure that each employee has been provided training in the following areas: the nature of the hazards associated with work within a controlled decking zone; and the establishment, access, proper installation techniques and work practices required by § 1926.760(c) and § 1926.754(e).

For additional steel erection requirements and information, refer to **OSHA Regulations – Subpart R – Steel Erection (1926.750 – 1926.761)**.

DEMOLITION

1. Prior to permitting employee to enter any building to be demolished, a survey will be made by a competent person to insure the possibility of collapse does not exist. This survey will be in written form and maintained at the job site.
2. All utilities will be shut off and disconnected outside of the building. Any utility company that is involved will be contacted.
3. Prior to starting demolition, it will be determined if any hazardous chemicals, gases, explosive or flammable material has been used in any pipes or tanks.
4. Asbestos will be removed by a licensed abatement company prior to commencement of any demolition work.
5. Lead will be removed by a licensed abatement company prior to commencement of any demolition work.
6. The following personal protection equipment is **MANDATORY** during all demolition operation:
    - Hard hats
    - Safety glasses
    - Leather gloves
    - Hearing protection
    - Full face shield (If applicable)
    - Steel toed boots or foot guards (if applicable)
    - Long sleeve shirts (If applicable)
7. Exhaust system will be installed prior to starting demolition work. If respirator is required, refer to Donahue McNamara Steel respirator program.
8. Only stairways, ladders, and passage ways that have been designated for means of access will be used. All others will be barricaded off in a manner that prohibits their use.
9. All chutes that are 45 degrees or greater angle will be fully enclosed on all sides.
10. All chute openings will be barricaded when not in use.
11. Dropping of material outside of the building without a chute is **STRICTLY PROHIBITED**.
12. Where material is dropped through a floor hole, the floor below will have a guard rail.

MATERIAL HANDLING

Appropriate materials storage and handling can help reduce job-site accidents and worker injuries. It can also make the construction process much more productive. One of the

leading causes of construction worker fatalities is being “struck by” objects. The following basic materials handling and storage principles can help reduce “struck by” incidence.

Methods of Prevention:

- Whether moving materials manually or mechanically, Donahue McNamara Steel employees shall be aware of the potential hazards associated with the task at hand and know how to exercise control over their workplaces to minimize danger.
- Moving, Handling, and Storing Materials:
- When manually moving materials, Donahue McNamara Steel employees shall seek help when a load is so bulky that it cannot be properly grasped or lifted, when they cannot see around or over it, or when load cannot be safely handled.
- When a Donahue McNamara Steel employee is placing blocks under raised loads, the employee shall ensure that the load is not released until their hands are clearly removed from the load. Blocking materials and timbers should be large and strong enough to support the load safely. Materials with evidence of cracks, rounded corners, splintered pieces, or dry rot shall not be used for blocking.
- Handles and holders shall be attached to loads to reduce chances of getting fingers pinched or smashed. Workers shall also use appropriate protective equipment. For loads with sharp or rough edges, wear gloves or other hand and firearm protection. To avoid injuries to the hands and eyes, use gloves and eye protection. When loads are too heavy or bulky, each Donahue McNamara Steel employee shall also wear steel-toed safety shoes or boots to prevent foot injuries if the worker slips or accidentally drops a load.
- When mechanically moving materials, avoid overloading the equipment by letting the weight, size and shape of the materials being moved dictate the type of equipment used for transporting it. All materials handling equipment has rated capacities that determine the maximum weight the equipment can safely handle and the conditions under which it can handle those weights. The equipment-rated capacities must be displayed on each piece of equipment and must not be exceeded except for load testing.
- Stored materials must not create a hazard. Storage areas must be kept free from accumulated materials that may cause tripping, fires or explosions or that may contribute to the harboring or rats and other pests. When stacking and piling materials, it is important to be aware of such factors as the materials’ height and weight, how accessible the stored materials are to the user, and the condition of the containers where the materials are being stored.
- All bound material should be stacked, placed on racks, blocked, interlocked, or otherwise secured to prevent it from sliding, falling or collapsing. A load greater than that approved by a building official may not be placed on any floor of a building or other

structure. Where applicable, load limits approved by the building inspector should be conspicuously posted in all storage areas.

- When stacking materials, height limitations should be observed. For example, lumber must be stacked no more than 16 feet high if it is handled manually; 20 feet is the maximum stacking height if a forklift is used. For quick reference, walls or posts may be painted with stripes to indicate maximum stacking heights.
- Used lumber must have all nails removed before stacking. Lumber must be stacked and leveled on solidly supported bracing. The stacks must be stable and self-supporting. Stacks of loose bricks should not be more than 7 feet in height. When masonry blocks are stacked higher than 6 feet, the stacks should be tapered back one-half block for each tier above the 6-foot level.
- Bags and bundles must be stacked in interlocking rows to remain secure. Bagged material must be stacked by stepping back the layers and cross-keying the bags at least every ten layers. To remove bags from the stack, start from the top row first. Baled paper and rags stored inside a building must not be closer than 18 inches to the walls, partitions, or sprinkler heads. Boxed materials must be banded or held in place using cross-toes or shrink plastic fiber.
- Drums, barrels and kegs must be stacked symmetrically. If stored on their sides, the bottom tiers must be blocked to keep them from rolling. When stacked on end, put plank, sheets of plywood dunnage or pallets between each tier to make a firm, flat, stacking surface. When stacking materials two or more feet high, the bottom tier must be chocked on each side to prevent shifting in either direction.
- When stacking, consider the need for availability of the material. Material that cannot be stacked due to size, shape or fragility can be safely stored on shelves or in bins. Structural steel, bar stock, poles, and other cylindrical materials, unless in racks, must be stacked and blocked to prevent spreading or tilting, Pipes and bars should not be stored in racks that face main aisles; this could create a hazard to passers-by when supplies are being removed.

IDENTIFICATION AND DEALING WITH FUME, SMOKE, AND DUST

The purpose of this plan is to provide safe working conditions for employees performing erection, welding, grinding, and metal cutting operations.

A. **Exposure Determination:** All DMS personnel need to be aware of the jobsite dangers relating to fumes, smoke, dust, and mists. "Exposure of employees to inhalation, ingestion, skin absorption, or contact with any material or substance at a concentration above those specified in the " 'Threshold Limit Values of Airborne Contaminants for 1970' " of the American Conference of Governmental Industrial Hygienists, shall be avoided". [1] Thus, even in open air conditions, but especially in any enclosed environment, DMS management, i.e., the Foremen, Superintendents, and Project Managers, will evaluate if fume, smoke, or dust beyond the aforementioned limits are or will remain in the atmosphere of the work area.

B. **Implementation:** The DMS Foreman and Superintendent are responsible for ensuring all personnel work in a safe environment. If potential hazards relating to fumes, smoke, and dust are seen to exist or to potentially come into play during the course of a work shift, a Job Hazard Analysis (JHA) will be created that includes all components of potential problems or dangers and the specified means and methods of correction and course of action to create a safe working environment. DMS will monitor the area to determine if appropriate masks or respirators are required. If required, DMS will select respirators from the types listed in Table 1 of the OSHA Respiratory Protection Standard.[2] If DMS determines that atmospheric testing is required Appendix 22 sec. 11 procedures will be followed. If limits referred to in paragraph A., above, have been breached, DMS management will inform upper tier management and any other parties having supervisory responsibility for the project. If the breach of limits is confirmed and abatement is not effected, DMS will stop work and issue a Stop Work Notice until the area has been secured back to a safe level.

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[1] OSHA Section 1926.55(a); Occupational Health and Environmental Controls, and see Appendix A to the section that is the list of Threshold Limit Values of Airborne Contaminants for Construction.

[2] OSHA Section 1926.55(b); "To achieve compliance with paragraph (a) of this section, administrative or engineering controls must first be implemented whenever feasible. When such controls are not feasible to achieve full compliance, protective equipment or other protective measures shall be used to keep the exposure of employees to air contaminants within the limits prescribed in this section. Any equipment and technical measures used for this purpose must first be approved for each particular use by a competent industrial hygienist or other technically qualified person. Whenever respirators are used, their use shall comply with section 1926.103."

BACK INJURY PREVENTION

1. Back injury prevention training is necessary because of the following facts:
   - The majority of back injuries occur when picking up less than one pound
   - Eight out of ten Americans will eventually suffer a back injury
   - Once a back injury occurs, a future incident is three to four times more likely
   - When you bend at the waist to pick up 100 pounds, ¾ ton of force is exerted on the lower back
   - Some back injuries occur during slips, trips and falls

2. The number one cause of back injury is "improper lifting." Some of the types of injuries resulting from improper lifting are:
   - Sprains and/or strains – weak muscles are stretched and torn by poor posture and aggravated by improper lifting, twisting and bending
   - Disk problems – slipped disks, contusions and ruptures cause spinal cord damage, numbness or pain
   - Fractured vertebrae – usually the result of a fall

3. Some of the items to avoid when safe-guarding your back are:
   - Bending the back, bend at knees
   - Twisting the back, move feet
   - Extending or reaching to lift, slide load toward you or get help
   - Walking on wet surfaces
   - Excessive twisting or straining of your back while attempting to move in areas such as restricted areas or some confined spaces

4. One of the best methods for preventing beck injury is to follow the APL system as follows:
   - **A**ssess the load – path, look for obstructions, doors, extension cords; load size, is it too large or too awkward
   - **P**osition yourself – feet, get close to the load; grip and get the load close to your body; balance the load
   - **L**ift the load – bend at knees and lift with legs

5. Another back injury prevention system that has become very common-place, is the practice of **"Ergonomics."** Following are some examples of applied "Ergonomics:"
   - Use a table, box or bench whenever possible to avoid bending over for long periods of time
   - Change your position frequently by stretching, standing, bending or sitting
   - Avoid bending or twisting your back, use your knees to bend, pivot your feet to twist
   - Position items in the work area no lower than 15 inches and no higher than 55

inches to avoid extending or reaching when lifting; slide the object toward you or get assistance

- Avoid storing heavy objects above or below waist height
- Avoid lifting things you cannot see over

STRETCHING

Daily stretching has many benefits including:

- Prepares body for physical work activities – it is a wakeup call for your muscles
- Flexibility is increased – not just at work but all the time
- Your circulation is promoted – your muscles need oxygen from the blood to operate at peak performance
- Muscle tension is decreased – a static position locks the tendons
- Relaxation is increased – gives your brain something else to concentrate on instead of normal work activities
- Your range of motion is improved – progressively strengthens muscles and lengthens your tendons, which means greater range of motion.
- Your body awareness is increased – keeps those muscles from sleeping on the job
- Muscle fatigue is delayed – removes lactic acid from the muscles which contributes to fatigue
- Reduces frequency and severity of injury – there are proven results from numerous studies
- Your team morale is increased – it is not a competition, it's team building, enjoy it and benefit from the results

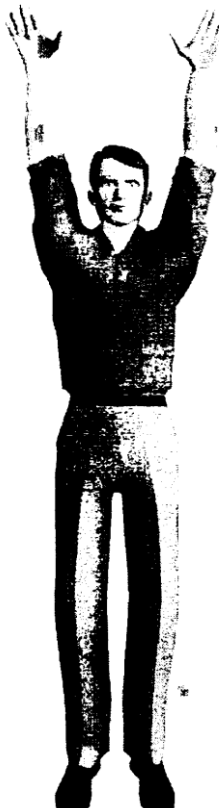
- Guidelines for beginning with your body in a neutral position:
  - Standing relaxed with your feet shoulder-width apart, bend your knees a little and contract your abdomen a little. This will help keep your back straight. Your shoulders should be relaxed and your chest lifted.
  - Hold each stretch for a count of 10 – 15 seconds
  - Do not bounce while you are stretching.
  - Breathe in a relaxed manner and don't hold your breath.
  - Do the stretches at your own rate – don't compensate.
  - Stretch just beyond the point of natural tension.
  - Make stretching a daily habit, and do it before you start work and immediately after work.
- Limitations
  - Make sure you do these stretches at your own pace and ability, stretch only within your own limits.
  - You should stretch to the point of comfortable tension, and then relax before you do the stretch.

- You should avoid straining while you are performing the stretches.
- None of these stretches should be painful.
- You should release the stretch slightly if your muscles begin to shake.
- If you experience any pain in the joint area, back off the stretch and make sure you are doing it correctly. If necessary, you should try another position or a different stretch for the target muscles.
- You should breathe slowly and rhythmically while holding these stretches. Don't hold your breath; it is important that oxygen is getting to the blood and muscles.

Shoulder Shrug with High Reach

1. Lift (shrug) shoulders as high as possible while slowly raising your arms to fully extend position above head.
2. At the same time, lift the body up onto your toes (for as long as comfortable). While reaching high, extend and spread fingers.
3. Hold this position for 10 seconds and then slowly lower arms to the side into a neutral body position. Relax while breathing slowly and rhythmically. Concentrate on your breathing rate for at least 5 breathing cycles.

Target: Biceps, lats, forearms, and muscles that support the spine. Particularly good for using hand tools and light lifting tasks.



Triceps Stretch

1. Bring right hand to upper back between shoulder blades from above shoulder.
2. Place left hand on the triceps (muscle on the underside of the arm) near the elbow.
3. Gently pull right elbow up and back with left hand, moving the right hand down center of upper back as far as comfortable. This should not cause pinching in the neck. Repeat on opposite side.

Target: Triceps and shoulders, particularly good for light lifting, carrying or pushing such as laborers, and mail clerks.

Neck Stretch

1. Keep your neck as straight as possible while relaxing your shoulders. Tilt your head to the right, slowly lower head toward right shoulder.

2. Repeat in four positions: right, left, front and back each time returning to the upright position.

3. Be sure to do this slowly and do not hold your breath. There should be a complete breath cycle with each position of the head!

Target: Neck muscles and stress reducer, particularly good for equipment operators, office personnel, and engineers.

Upper Trunk Stretch

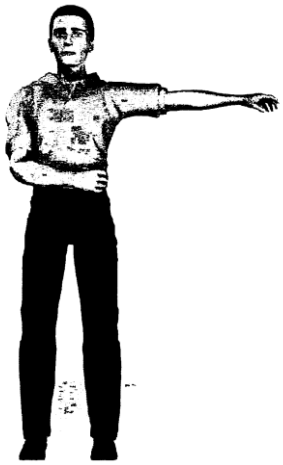
1. Place Hands on back of hips.
2. Slowly arch upper body backward to a comfortable position. Hold while continuing to breathe.
3. Return to neutral position and repeat two more times.

Target: Lower back, abdominals. Particularly good for truck drivers, equipment operators, laborers.

Shoulder Rotation Stretch

1. Keeping knees slightly bent, clasp hands behind back.
2. Slowly bend forward from waist to a comfortable angle while lifting arms upward and behind your back.
3. Hold position for one breath cycle and slowly return to upright position. Repeat 2 more times.

Target: Shoulders and upper back. Particularly good for carpenters, office workers.



Trunk Rotation

1. Extend left arm out to side and grasp left hip with right hand.
2. Rotate upper body to the left while pulling on hip with right hand.
3. Release tension and change to other side. Repeat on opposite side.

Target: Lower back and trunk support muscles. Particularly good for laborers, mechanics, and iron workers.

Lateral Rotation Stretch

1. Stand upright with feet slightly apart for balance. Extend left arm out to side and grasp left hip with right hand.
2. Rotate upper body to left while pulling on hip with right hand, then bend slowly from waist to left side to a comfortable angle.
3. Return to upright position and change hand locations to other side. Repeat on opposite side.

Target: Lats, lower back muscles, abdominals, and upper leg muscles. Particularly good for laborers, iron workers.

Lateral Stretch

1. Place right hand on waist, extend left arm over head and bend upper body sideways to the right.
2. Hold position for one breath cycle and return to upright position.
3. Repeat two more times and change hand position to other side. Repeat on opposite side.

Target: Lats and triceps plus shoulder mobility. Particularly good for masons, riggers, machinists.

Single Leg Stretch

1. Cross leg, keeping both knees slightly flexed.
2. Bend forward slowly from the waist and place both hands on the forward knee. Continue bending forward as far as possible.
3. Hold position for one breath cycle. Warning: discontinue this exercise if you become dizzy or lose your balance. Change leg position and repeat.
4.

Target: Hamstrings, lower back muscles and stability. Particularly good for laborers, masons, and mechanics.

Single Quadriceps Stretch

1. With your left hand holding onto a stationary object for support, grasp your right ankle behind hips with right hand.
2. Pull ankle upward to stretch the quadriceps muscle. Warning: do not attempt this exercise if you have problems with balance or severe knee injuries. If you have knee injuries, you may elect to lift the lower leg behind you and hold the position for 10 seconds. Repeat on opposite side.

Target: Quadriceps and also helps body balance and ankle strength. Particularly good for laborers, flaggers, and ironworkers.

Calf Stretch

1. Stand in upright position, left leg forward.
2. Flex the upper trunk forward and place both hands on left knee.
3. Keeping both feet flat on the floor, slowly push hips and body forward as far as possible as though you are leaning into something. The stress should be on the calf muscles in the back of the right leg if you keep your feet flat. Repeat on opposite side.

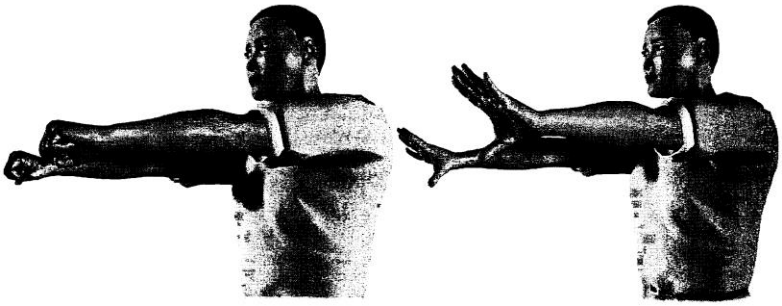
Target: Calves, lower back muscles. Particularly good for operators, teamsters, maintenance workers.

Wrist Extension

1. Palms together with fingers apart, press momentarily together and release.
2. Stretch arms out forward and make a fist in each hand. Hold 5 seconds and open hands wide.

3. Force your thumbs down while keeping fingers pointing toward the sky, wrists are bend back and elbows should be locked. You should feel a slight burn in the upper muscles (extensor muscles) of the forearm. These muscles are frequently less used and developed than the flexor muscles in the forearm which leads to unbalance and potential wrist injuries.
4. Hold 10 seconds and release. Return your arms to the neutral position at your side and shake out your hands.

Target: Exterior muscles. Particularly good for carpenter, administrative professionals, machinists, and maintenance workers.



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APPENDIX 1

Donahue McNamara Steel

Employee Discipline Actions for Safety Policy Violations

FIRST SAFETY VIOLATION - Verbal / written warning documented.

Elements

1. Non-Imminent Danger to Life and Health (IDLH) violation
2. Violation contrary to the training and / or New Hire Orientation given by Donahue McNamara Steel.
3. Violation must occur by choice of employee NOT by management direction.
4. Violation must be reviewed by Foreman and/or Project Manager to determine level of discipline. (Verbal reprimand by the Foreman, warning letter into file, suspension, etc.)
5. Foreman's action to be reviewed by Corporate Management pertaining to Safety Violation.

SECOND SAFETY VIOLATION - Written Warning / Suspension

Elements

1. Repeat of FIRST VIOLATION or IDLH situation.
2. Violation contrary to training or policies of Donahue McNamara Steel.
3. Must be reviewed by Foreman and/or Project Manager to determine level of discipline greater than FIRST SAFETY VIOLATION discipline.
4. Re-training of employee mandatory. (New Hire Orientation as well as task specific training pertinent to SECOND SAFETY VIOLATION.
5. Foreman's action to be reviewed by Corporate Management pertaining to Safety Violation.

THIRD SAFETY VIOLATION - Termination

Elements

1. Repeat of SECOND SAFETY VIOLATION or IDLH situation.
2. Violation contrary to training or policies of Donahue McNamara Steel.
3. Foreman's action to be reviewed by Corporate Management pertaining to Safety Violation and re-evaluate additional training needs if necessary.

APPENDIX 2

Donahue McNamara Steel

Employee Discipline Report

Job Name: _____ Job Number: _____

The following warning and disciplinary action was issued today and is made part of the personnel file for:

Employee Name: _____ SS#: _____

Position: _____ Date: _____

---

1. Offence: _____

_____

2. Facts leading to the warning. Be specific as to date, time, witnesses, and detailed explanation: _____

_____

_____

3. Corrective action to be taken by employee: _____

_____

4. Next disciplinary action that will be taken: _____

_____

5. Comments: _____

_____

Foreman Signature: _____ Date:_____

Employee Signature: _____ Date:_____

Witness Signature: _____ Date:_____

Send copy to Donahue McNamara Steel Company Office

APPENDIX 3

PRE-TASK PLAN

Date Plan Prepared:	_____
Job Name:	_____
Job Location:	_____
Author/Planner:	_____

Location of Work:		
Task to be accomplished:		
Start Date/Time:	End Date/Time:	Crew Size:
Housekeeping Plan (trash removal, Clean-up, responsible person, frequency):		
Material Storage & Handling Plan (deliveries, laydown, equipment):		
Access & Hosting Plan (Personnel & Materials):		

Please consider the work to be performed and check 'yes' or 'no' (attach additional information as needed):

1. Does every crew member know how to use assigned tools & equipment?	☐yes ☐no	9. Is there <u>any</u> potential to impact existing Owner or Construction activity?	☐yes ☐no
2. Does this work require special training?	☐yes ☐no	10. Are there occupied spaced adjacent or below?	☐yes ☐no
3. Do you need additional or special personnel to complete this task?	☐yes ☐no	11. Have shop drawing, contract drawing, & as-builts been reviewed?	☐yes ☐no
4. Do you need additional or special materials and tools to do the job?	☐yes ☐no	12. Will there be any discharge or fluids?	☐yes ☐no
5. Do you need to review an MSDS to proceed with this work?	☐yes ☐no	13. Does this task require any special permits/procedures?	☐yes ☐no
6. Is there adequate lighting and access?	☐yes ☐no	14. Do other subs need to be involved?	☐yes ☐no
7. Will weather conditions affect the safety or quality of this work?	☐yes ☐no	15. Employees are assigned a "buddy"?	☐yes ☐no
8. Does this task require shutdown of systems or equipment?	☐yes ☐no	16. Crew knows location of fire extinguishers, eye washes, phones?	☐yes ☐no
		17. Work involves awkward positions, heavy or repetitive lifting?	☐yes ☐no

Check if any of the following apply (attach additional information as needed):

☐ Public Interface	☐ Confined Space	☐ Electrical Hazards	☐ Critical Lift Plan	☐ Fall Protection PPE	☐ Respirator PPE
☐ Traffic Control	☐ Chemical Exposure	☐ Lock-Out/Tag-out	☐ MSDS/HazCom	☐ Hand/Arm PPE	☐ Hearing PPE
☐ Barricades/Signs	☐ Ventilation	☐ Open Flame Welding	☐ _____	☐ Full Body PPE	☐ Eye/Face PPE

Construction Activity (In Sequence)	Hazards Identified	Preparation

NOTE: Attach supplemental information as needed **This is Page 1 of _____**

The tasks have been reviewed <u>in the work area</u> where they will be performed and this plan has been reviewed with the workers on this crew.

Foreman Signature: _____ Cell: _____ Reviewed By; _____

Crew Sign in:

IF WORK CONDITIONS CHANGE, <u>WORK MUST STOP</u> AND A NEW PLAN MUST BE PREPARED.

APPENDIX 4

Donahue McNamara Steel

Employee Responsibilities

General Safety Rules

1. Practical jokes, horseplay, scuffling or any other conduct that would subject an employee to risk is prohibited.

2. Only safe, approved work methods and procedures will be used. Employees will not take unnecessary risks while performing work activities.

3. Injuries, no matter how minor, must be reported as soon as possible.

4. Containers of solvents, sealers, paint thinners or adhesives will be labeled, properly covered and stored in approved areas.

5. Compressed gases will be identified and properly stored and secured in the upright position and will be separated as required.

6. Traffic lanes, aisles, stairways, exits and fire doors will be kept free of slippery substances and kept clear of parts, materials, equipment and rubbish at all times.

7. All ladders will be set-up and used properly and only for their intended purpose.

8. Do not stand on the top or top step of any stepladder.

9. Always use stepladders in the open position and never use leaning against a wall or machinery, etc.

10. Extension or straight ladders used to access another level must extend 3 feet beyond that level and be secured.

11. Ladders will be free of defects.

12. Stairways, aisles, walkways, breaker panels, firefighting equipment and material storage areas will be kept clear and free from obstruction or debris.

13. Work locations will be kept clean and orderly at all times.

14. Combustible waste, such as oil-soaked rags and waste material, will be disposed of in approved metal containers with tight-fitting metal lids when inside of buildings. Containers will be emptied daily.

15. Flammable liquids, such as gasoline, naphtha, lacquer, thinner, etc., will not be used for general purpose cleaning.

16. Protective gloves, aprons, face shields or glasses should be worn when pouring or handling acids or corrosive solutions.

17. All employees will dress in a manner appropriate to their occupation and the hazards of their job. In the operations area, employees must abide by established uniform codes.

18. Eye protection will be worn by all employees at all times on the job-site. Specific eye protection will be used by employees performing specialized work that creates hazardous conditions for their eyes. Employees will wear chemical goggles when working with chemicals that may be splashed into the eyes.

19. Welding safety gear will be worn at all times. Full leathers, shields, burning goggles are required.

20. There will be no consumption of alcoholic beverages or other intoxicants on owned Company property or in Company vehicles. The use of alcoholic beverages, narcotics or other intoxicants will be grounds for termination.

21. Fall protection is required whenever an employee is exposed to a fall of 6 feet or greater.

APPENDIX 5

Donahue McNamara Steel

Subcontractor's Notice of Safety Violation

Date of Notice: _____ Job Name/Number: _____

Inspection by: _____ Date of Inspection: _____

Firm and Foreman Name: _____

Your company is in violation (or needs to review requirements) of the following safety regulation. **IMMEDIATE CORRECTION (or action) IS REQUIRED**. A written response, to the project Foreman, is required within 5 working days. This notice should be distributed to all applicable parties.

1. [ ] Safety posters /Emergency numbers.
2. [ ] First-aid kit
3. [ ] HAZCOM requirements.
4. [ ] House keeping / Clean-up.
5. [ ] Personal protection equipment. (Head, feet, hand, eye, ear, and lung.)
6. [ ] Body harnesses and lanyards.
7. [ ] Fire extinguishers / prevention plan.
8. [ ] Access / egress and illumination.
9. [ ] Flammable liquid / gas storage.
10. [ ] Signs, barricades, and walkways.
11. [ ] Material storage and rigging.
12. [ ] Tools - hand and power.
13. [ ] Powder actuated tools.
14. [ ] Welding and cutting equipment.
15. [ ] Electrical - tools / lock-out.
16. [ ] Electrical - GFCI.
17. [ ] Electrical - cords / wiring.
18. [ ] Scaffolding / railing.
19. [ ] Floor and wall opening.
20. [ ] Crane / hoists.
21. [ ] Aerial lifts / power equipment.
22. [ ] Motor vehicles.
23. [ ] Excavation and trenching
24. [ ] Demolition.
25. [ ] Rollover / overhead protection.
26. [ ] Concrete / steel / masonry
27. [ ] Stairways / ladders.
28. [ ] Other:
29. [ ] Other:

Comments: _____

_____

_____

_____

_____

CC: Subcontractor's Corporate Office, General Foreman, and Donahue McNamara Steel' Corporate Office.

APPENDIX 6

Donahue McNamara Steel

Stop Work Order

Date: _____

Time: _____

Contractor: _____

Donahue McNamara Steel' Job Name/Number: _____

Description of safety violation(s):

_____

_____

_____

_____

Donahue McNamara Steel Representative: _____

Subcontractors Representative: _____

CORRECTIVE ACTION TAKEN

_____

_____

_____

Start Work Order

Date: _____

Time: _____

Donahue McNamara Steel' Representative: _____

Subcontractor's Representative: _____

APPENDIX 7.1

Donahue McNamara Steel

Needs Assessment and Pre-Construction Planning Checklist

The following is a list of items that should be used as a guide during your pre-job planning activities. This list is not comprehensive. Specific job-site activities should be added as necessary.

1. Posting Requirements:

_____ A. Telephone numbers of ambulance, doctor, fire department and/or hospital.
_____ B. OSHA Poster
_____ C. Safety Poster
_____ D. Crane signal poster (If applicable)
_____ E. Local Requirements

2. First-Aid and Medical:

_____ A. List of approved doctors or clinics (Available from corporate office)
_____ B. Well stocked first-aid kit present on job-site
_____ C. At a minimum, one person on each shift with a valid First-aid/CPR certification
_____ D. At least one litter capable of lowering an injured person from an elevated work area by crane is on the job-site (If applicable)

3. Personal Protective Equipment:

_____ A. Adequate supply of hard-hats
_____ B. Adequate supply of safety glasses
_____ C. Adequate supply of prescriptive glasses side shields
_____ D. Full body harnesses for employees
_____ E. Adequate supply of hearing protection
_____ F. Gloves/hand protection
_____ G. Foot guards

4. Warning and Danger Signs:

_____ A. Hard hat area
_____ B. First-aid stations
_____ C. No Smoking
_____ D. Workman working above
_____ E. Fire extinguisher
_____ F. “Right to Know Labels”
_____ G. Out of order tags
_____ H. Caution Tape
_____ I. Do not enter
_____ J. SDS location
_____ K. Overhead electrical lines
_____ L. First Link Safety Services representative's placard

5. Fall Protection:

_____ A. An adequate supply of guardrails (2x4), posts scaffold post brackets, and plywood to provide protection at slab edges and floor openings

_____ B. An adequate supply of portable ladders, in good condition and the right height

_____ C. An adequate supply of scaffold grade planking

_____ D. Mobile scaffolding is provided with positive locking casters, guardrails, and a ladder

_____ E. Adequate body harnesses and lanyards

6. Falling Material:

_____ A. A safe access route to the work site has or will be provided and may include:

- Covered walkways at entry of multi-story jobs
- Ramps, stairs, and/or ladders
- Personnel hoists

_____ B. A plan has been developed under demo operations that provides for a watchman and warning signs, barricades and/or roping off area.

_____ C. A system has been devised to prevent material from accidentally falling from the building.

_____ D. All personnel that will be designated a "competent person" have had proper training in that particular operation.

7. Employee Training:

_____ A. All employees that are to work at elevations six feet or above have been trained in proper tie-off techniques.

_____ B. All employees who will be using powder actuated tools have a certificate verifying training.

_____ C. All employees who will be operating heavy equipment have been certified

_____ D. All employees who will be operating laser equipment have been certified

8. Electrical:

_____ A. Adequate ground fault circuit interrupters (GFCI) are on site

_____ B. Extension cords are of proper size, include grounding and are free of cuts

_____ C. All power tools are fully grounded or will be used with a GFCI

9. Housekeeping:

_____ A. Trash containers will be provided and emptied frequently

_____ B. All materials are separated and stacked at proper heights

_____ C. A trash container is provided for the disposal of drinking cups

10. Fire prevention:

_____ A. A fire prevention plan has been developed for the job-site

_____ B. Fire extinguishers are available on the job-site

_____ C. A fire escape plan has been developed and is posted

11. Excavations:

_____ A. Adequate shoring is on site

_____ B. A certified shoring plan is on-site (If applicable)

_____ C. A competent person has been designated on site

12. Cranes:

_____ A. A qualified employee has been designated to conduct a daily inspection of the crane

_____ B. Rigging equipment of the right type and quantity will be provided and inspected daily

_____ C. Controls have been instituted that will prevent any crane from coming in contact with any energized electrical lines

_____ D. All cranes have a barrier with warning signs to provide protection near the swing radius

_____ E. Operator is certified

_____ F. Copy of the annual inspection is in the crane and on file

_____ G. Crane has safety belt, fire extinguisher and crane signal poster

13. Anticipated Hazards:

_____ A. Pictures have been taken of existing building conditions.

_____ B. Pictures have been taken of surrounding area i.e. streets, businesses, buildings, houses, wells, ponds, and vegetation.

_____ C. Checks have been made for asbestos, lead and other possible hazardous substances.

14. Miscellaneous:

_____ A. Drawings/ plans showing all form work details will be available on the job-site.

_____ B. Drawings and plans for outrigger scaffolds are on the job-site.

_____ C. Certified copies of shoring plans are on the job-site.

_____ D. Arrangements have been made for site lighting. (If applicable)

_____ E. Arrangements have been made for adequate supply of drinking water and toilet facilities.

Job Name: _____ **Job Number:** _____

Foreman:_____ **Date:** _____

Project Manager: _____ **Date:** _____

Vice President:_____ **Date:** _____

Send a completed copy within 30 days after job start-up to the Donahue McNamara Steel' Corporate Office.

APPENDIX 7.2

Donahue McNamara Steel

Scaffolding Inspection Checklist

SCAFFOLDING INSPECTION CHECK LIST (1926.451)	Yes	No
Has scaffold been constructed to maintain a safety factor of 4 to 1? (a 1)		
Has scaffold been designated by a qualified person? (a 6)		
Has scaffold platform been fully planked with less than 1" gaps between planks?(b1i)		
Is the gap between the last plank and the uprights less than 9.5"? (b 1 ii)		
Are all platforms at least 18" wide? (b 2) If not are employees protected w fall prot?		
Are open sides of scaffold less than 14" from face of work (18" for plastering / lathing)? (b 3) If not are employees protected with fall protection equipment?		
Are all platform units cleated, restrained by hooks or extend over support by 6"?		
Are platforms of 10 feet or less extending over their end supports no more than 12" or have guardrails to block access to overhang?		
Where platforms of 10 feet or more extending over their supports no more than 18" or have guardrails to block access to overhang?		
Are abutted planks resting on separate support surfaces? (b 6)		
Are planks overlapped over their supports, 12" over each other or nailed/secured?		
Are planks that rest on the bearer at other than a 90 degree angle laid first? (b 8)		
Are the top and bottom surfaces of the plank free of paint and opaque finishes?		
Has competent person approved the use of components from different manufactures		
Scaffolds higher than the 4:1 height to base ratio secured from horizontal member?		
Has the first vertical tie been installed at a height less than 4 x the base dimension?		
Have vertical ties been repeated every 20' for scaffolds 3' or less in width or 26' for scaffolds wider than 3' and extra ties installed to counteract eccentric loads?		
Is the vertical distance from the top tie to the top of the scaffolding less than 4:1?		
Are scaffolds erected on adequate, firm footings (no unstable objects or settled)?		
Is scaffold plumb and braced?		
Has safe access been provided at more or less than 2' (No climbing cross braces)?		
Do all portable ladders meet 1926 Subpart X standards and positioned safely?		
Bottom rung less than 2' above the supporting surface and rest platforms every 35'?		

If ladder is built into end frames: was the frame designed to be used for access? Are the rungs at least 8" in length, uniformly spaced and no more than 16 ¾" between rungs? Do the rungs and steps of the ladder line up directly with rest docks (35')?		
Direct access from other structures prohibited at >24"vertically or >14" horizontally?		
Are scaffolds and components loaded within their rated capacities?		
Have the use of lean to or shore scaffolds been prohibited?		
Has the scaffold been inspected by a competent person every work shift?		
Have damaged parts been repaired replaced or removed as required?		
Has the movement of occupied scaffold been prohibited?		
Are slippery conditions removed as soon as possible?		
Are tag lines used to control loads onto or near scaffolds?		
If storms and high winds are present has the competent person been consulted and wind screens or personal fall arrest systems used?		
Are tools, material, and debris removed from scaffold to prevent accumulation?		
Has the use of makeshift devices and ladders to increase the working level height been prohibited? (check 1926.451 (f)(15)(I,ii,iii, and iv)?		
Have provisions to prevent platforms from deflecting more than 1/60th of the span been made?		
Are guardrails (38-45" high) used on all scaffold over 10 feet or PFAS where guardrails aren't feasible? Are they installed on the working side at more than 14"?		
When mesh or screens are installed do they extend from the top of the guardrail to the platform?		
Will the guardrails withstand 200 lbs in a downward or outward direction?		
Have toeboards (>3 ½ ") screens, or barricaded area below been installed?		
Tube and Coupler Scaffold		
Is "X" bracing installed on the ends of the scaffold and every third set of posts horizontally and every fourth runner vertically?		
Are ties installed at the bearer level?		
Is longitudinal bracing installed at a 45 degree angle on both faces of the scaffold?		
Does the longitudinal bracing extend from both end posts to the extreme top of the scaffold?		
If the scaffold is longer than 5 posts, is a new line of bracing begun at every fifth post?		
Is bracing installed as close to the node point as possible?		
Are the bearers attached to both posts and does the inboard coupler rest on the runner coupler?		
If bearers are attached to the runners is the bearer as close as possible to the posts?		
Do the ends of the bearer tube have full contact with the clamp?		

Are runners installed on the inside and outside of the scaffold at level heights?		
If outside runners are left out, are there midrails and guardrails above and below where the runner would have been?		
Are runners interlocked and coupled to each post?		
Are the bottom runners as close to the base as possible?		
Do light and medium duty scaffolds have posts, runners, bearers, and braces of 2” O.D. steel tubing?		
Are posts on light-duty scaffolds spaced no more than 4’ apart by 10 along the length of the scaffold?		
Are posts on medium-duty scaffolds spaced no more than 4’ apart by 7’ along the length of the scaffold?		
Is the maximum vertical runner spacing of 6’6”?		
If the maximum number of planked levels, working levels, or height exceed those shown in table b, are drawings done by a registered professional engineer?		
Fabricated Frame Scaffold		
Are frames secured by braces which secure the vertical members laterally?		
Do braces automatically square and align the frames and are all brace connections secured?		
Are frames joined together by coupling pins or equivalent means?		
Are frames locked together where uplift can occur?		
Has the use of side brackets and their impact on the overall scaffold been fully evaluated?		
Have scaffolds over 125’ in height been constructed and loaded according to a registered professional engineer?		
Mobile Scaffold		
Are casters locked during use?		
Is the manual force used to move the scaffold applied as close to the base as possible?		
Are scaffolds stabilized to prevent tipping over during movement?		
Are casters pinned into the frames or adjustment screws?		
If rolling scaffolds are being moved with employees on board are all criteria of 452(W) being met?		

APPENDIX 8

Donahue McNamara Steel

Employee Orientation

A. Purpose: Orientation of new employees, re-hires, part-time employees and those transferred from another facility within the Donahue McNamara Steel, will begin the first day of employment on the new job. This program will provide an introduction of Donahue McNamara Steel' policies and rules and will include a thorough safety briefing. The orientation should include a tour of the facilities to acquaint the employee with the entire operation. The employee should also be advised how his/her job is important to the total operation.

B. Procedure: The immediate Foreman of the employee will thoroughly instruct him/her in job safety requirements. A Safety Orientation checklist follows. The checklist must be completed by checking each item as it is covered, signing by the Foreman and employee and returning it to the corporate office for placement into the employee's file. The employee responsibility list contained in Appendix 1 will also be reviewed with the employee by the Foreman.

C. All new employees will be given training prior to actually working on site at a project. This training will be a hands-on explanation of the Corporate Safety Program as well as any specific production training needed for the safe completion of a task.

Donahue McNamara Steel

Employee Orientation Checklist

EMPLOYEE'S NAME _____

JOB ASSIGNMENT _____ DATE HIRED _____

Circle One: New Employee Transfer Re-hire Part-Time

[ ] 1. Purpose of orientation.
[ ] 2. Report accidents to Foreman immediately.
[ ] 3. First Aid.
   A. Obtaining treatment.
   B. Location of facilities.
   C. Location and names of first aid personnel.
[ ] 4. Potential hazards on the job and in the Department.
   A. What they are.
   B. How to use safely.
   C. Care and use of personal protective equipment.
[ ] 5. What to do in event of emergencies.
   A. Exit locations and evacuation routes.
   B. Use of firefighting equipment (extinguishers, hoses).
   C. Specific procedures (medical, chemical, fire, etc.).
[ ] 6. The total safety program.
   A. Function of Safety Committees and meetings.
   B. Introduce to Safety Committee representative.
   C. Safety policy and rules and their value.
[ ] 7. Personal work habits.
   A. Proper lifting techniques.
   B. Horseplay, good housekeeping, smoking policy.
   C. Safe work procedure.
[ ] 8. Vehicle safety.

I have instructed this employee on the items checked and believe he/she can perform assigned duties safely.

Date _____

Foreman _____

Employee _____

APPENDIX 9.1

Donahue McNamara Steel

Emergency Procedures

1. Establish procedures for the sounding of alarms.

2. The alarms will be capable of being perceived above ambient noise or light levels by all employees in the affected portions of the workplace.

3. The alarms will be distinctive and recognizable as signals to evacuate the work area or to perform actions designated under the disaster plan.

4. The alarm system will be maintained in operating condition except when undergoing repairs or maintenance. A back up alarm, such as employee runners or telephones, will be provided when systems are out of service.

5. Fire protection equipment will be properly located and mounted at all times.

6. Employees will be familiar with both location and operation of all fire protection equipment and systems in the vicinity of their work area.

7. Only ABC type extinguishers are to be used.

8. Establish emergency escape procedures and escape route assignments.

9. Establish procedures to be followed by employees who remain to operate critical department operations before they evacuate.

10. Establish procedures to account for all employees after evacuation has been completed.

11. Designate refuges or safe areas that will provide sufficient space to accommodate the employees during evacuation and for necessary first aid treatment.

APPENDIX 9.2

Donahue McNamara Steel

Fire Extinguisher Safety

Choosing to evacuate the workplace rather than providing fire extinguishers for employee use will most effectively minimize the potential of fire-related injuries. Additionally, training employees to use and maintain portable fire extinguishers requires considerable resources. On the other hand, you will want to consider the availability of a public fire department and the time it may take to respond as well as the vulnerability of egress routes when you're making a policy decision on this issue.

Risk Assessment

Prior to fighting any fire with a portable fire extinguisher, those involved must perform a risk assessment that evaluates the size of the fire, the evacuation route the fire extinguisher users will use and the atmosphere in vicinity of the fire.

Characteristics of fires that CAN BE extinguished with portable fire extinguishers:	**Characteristics of fires that SHOULD NOT be extinguished with portable fire extinguishers:**
• The fire is limited to the original materials ignited • It is contained in a wastebasket or other receptacle • The flames are no higher than the fire fighter's head • The fire has not depleted the oxygen in the room • Heat is being generated but the room temperature is only slightly increased • Smoke may be accumulated on the ceiling but visibility is good • There is a clear evacuation path behind the fire fighter as he uses the extinguisher	• The fire involves flammable solvents and has spread over more than 60 square feet • It cannot be reached from a standing position • It is partially hidden behind a wall or ceiling • The fire cannot be fought without respiratory protection • The radiated heat is easily felt on exposed skin making it difficult to approach to within 10-15 feet of the fire • Smoke is filling the room very quickly decreasing visibility • Fire, heat or smoke may block the evacuation path

Do you know how to extinguish a fire? According to OSHA regulations, no one at a workplace should use a fire extinguisher unless they have been trained to do so. Though this may seem restrictive, there are several good reasons for this rule. If an untrained person tries to extinguish a blaze, some serious mistakes can happen. Any of these mistakes can cause the fire to become worse, or injure or kill the individual. This week's Toolbox Talk features instructions on proper use of portable fire extinguishers.

There are four things to remember when it comes to using a fire extinguisher: **Use Your Judgment, Communicate, Ready the Extinguisher,** and **Use It**. You must also know what to do if your efforts fail.

Use Your Judgment --When you see smoke or fire you should use your own good judgment before you decide to extinguish the blaze. Ask yourself these questions:

- Is the fire limited in size and spread?
- Will you have an escape route if something goes wrong?
- Do you know the location of the nearest fire extinguisher?
- If you are confident the fire is controllable and your safety is ensured, attempt to put it out. If the answer to any of these questions is *no*, evacuate the area immediately.

Communicate -- Once you have decided to extinguish the blaze, make every reasonable attempt to tell at least one other person what you are doing. This person should report your activity to someone else as soon as possible.

Ready the Extinguisher --You must select the proper extinguisher. Fire extinguishers are classified according to the type of fires they extinguish. It is very important to use the proper extinguisher. Some extinguishers are rated for more than one class. Some are for only one type of fire. Just be sure the extinguisher you're using is rated for the fire you're extinguishing.

- Class A: Use on ordinary combustibles such as wood, cloth, paper, rubber, and many plastics.
- Class B: Use on flammable liquids such as gasoline, oil, grease, tar, oil-based paint, lacquer, and flammable paint.
- Class C: Use on energized electrical equipment including wiring, fuse boxes, circuit breakers, machinery, and appliances.
- Class D: Use on flammable solids such as magnesium.

1. Quickly but carefully remove the extinguisher from its mounting bracket. It may be heavy, so use caution when lifting it.
2. Stand about six feet from the fire.
3. Extend the nozzle toward the fire.

Use It --Once the extinguisher is ready, you are ready to release the extinguishing agent. This must be done properly. For example, if you squeeze the handle before you have aimed the nozzle properly, valuable time and extinguishing agent will be wasted.
A technique to remember for using an extinguisher is published by the National Fire Protection Association (NFPA). It is known as the **P.A.S.S.** *Technique*.
The **P.A.S.S.** Technique:

Pull out the pin that secures the handle.
Aim the extinguisher nozzle at the base of the fire.
Squeeze the handle. (Do not be startled by the noise or velocity of the agent as it is released.)
Sweep the agent stream from side to side across the base of the fire until it is completely out. Be alert for re-ignition. If this happens, douse the fire until the extinguisher is empty.

Once the fire is out, back carefully away from the scene. This will enable you to know immediately if the fire re-ignites.
Knowing how to use a fire extinguisher the right way is an important skill. Sometimes, though, in spite of your best efforts, your attempt may fail. The last point to remember about using a fire extinguisher is what to do if your efforts fail. It is really quite simple. If you cannot extinguish the blaze or it recurs repeatedly, **evacuate the area immediately**.

Inspection

Make sure your extinguishers have been properly inspected.
Monthly: Have someone at your company who has been designated to inspect and initial the tag on the extinguisher every month. Look for damage to the extinguisher including dents, damage to gauge, reading of the gauge, pin in place, cracks or damage to hose, no obstructions around the extinguisher, etc.
Yearly: The employer shall assure that portable fire extinguishers are subjected to an annual maintenance check. Stored pressure extinguishers do not require an internal examination. The employer shall record the annual maintenance date and retain this record for one year after the last entry or the life of the shell, whichever is less. The record shall be available to the Assistant Secretary upon request.

In addition to an external visual examination, the employer shall assure that an internal examination of cylinders and shells to be tested is made prior to the **hydrostatic tests**.

Type of extinguishers	Hydrostatic Test interval (years)
Soda acid (soldered brass shells) (until 1/1/82)	(1)
Soda acid (stainless steel shell)	5
Cartridge operated water and/or antifreeze	5
Stored pressure water and/or antifreeze	5
Wetting agent	5
Foam (soldered brass shells) (until 1/1/82)	(1)
Foam (stainless steel shell)	5
Aqueous Film Forming foam (AFFF)	5
Loaded stream	5
Dry chemical with stainless steel	5
Carbon Dioxide	5
Dry chemical, stored pressure, with mild steel, brazed brass or aluminum shells	12
Dry chemical, cartridge or cylinder operated, with mild steel shells	12
Halon 1211	12
Halon 1301	12
Dry powder, cartridge or cylinder operated with mild steel shells	12

[1]Extinguishers having shells constructed of copper or brass joined by soft solder or rivets shall not be hydrostatically tested and shall be removed from service by January 1, 1982. (Not permitted)

APPENDIX 10

Donahue McNamara Steel

Safety Bulletin Board

A. Purpose: In addition to the methods defined below, the bulletin board is another method to increase employees' awareness of safety and health and communicate management's safety message.

B. Procedure: The following consideration should be made for bulletin board effectiveness:
   1. Placed in a spot where there is greatest employee exposure (lunchroom, break room, job trailer, near time clock, etc.)
   2. Posting should be neatly arranged.
   3. Posters, Safety Committee minutes and other information that becomes dated or worn should be changed periodically.
   4. A specific safety bulletin board or portion of an existing board should be designated and that spot reserved **EXCLUSIVELY** for safety material.
   5. A Safety Committee member will be designated to maintain the bulletin board as recommended above.

C. The following items are required to be posted:
   1. Employer /Employee notifications
   2. Safety bulletins and posters.
   3. Emergency telephone numbers.
   4. Evacuation layout drawing.
   5. Minutes of the last Safety Committee meetings.
   6. Changes in operations (processes/hazards) as applicable.
   7. Names of employees First Aid trained and certified.
   8. Any inspection reports by OSHA /State Compliance officers.
   9. State Workman's Compensation Compliance poster.
   10. OSHA 300 Log (February).
   11. First Link Safety Services representative placard.

To print the required OSHA Posters, please go to the links below!

http://cl.idaho.gov/ftp/requiredposters.pdf

http://www.dol.gov/vets/programs/userra/USERRA_Private.pdf

APPENDIX 11

Donahue McNamara Steel

Accident Investigation and Reports

A. Definition and Purpose: ALL ACCIDENTS that may or may not involve personal injury, no matter how minor, will be reported PROMPTLY to the immediate Foreman for investigation and evaluation. Every accident includes a sequence of contributing causes. By eliminating the first event, it is possible to avoid a repeat performance of an accident. The removal of a single cause can prevent a recurrence. During the Foreman's evaluation, he/she must determine the possible consequences that could take place if the situation is not corrected and take appropriate action based upon those findings (i.e., investigate, report, correct, etc.).

B. Medical Emergency Procedure:

The telephone number of emergency services will be posted near the phone and on the safety bulletin board**.** A Donahue McNamara Steel official or designee will accompany the employee to the doctor or hospital. A post-accident drug screen will be performed as soon as medically possible.

C. Documentation Procedures:

1. MINOR INJURIES (requiring doctor/outpatient care)

After the emergency actions following an accident, an investigation of the accident will be conducted by the immediate Foreman in conjunction with any witnesses to the accident, to determine the causes. The findings of the investigation will be documented on an incident investigation form. The First Report of Injury and the Accident/Injury Checklist must be completed. Distribution of the completed forms will be as follows:

A. Copy to the Project Manager.
B. Copy to Corporate Management.

2. MAJOR INJURIES (fatality or multiple hospitalizations)

a. Foreman and Corporate Management are to be notified immediately. An investigation under the direction of management will be conducted. Corporate Management and the Foreman of the injured person(s) will be included in the inspection party. The

corporate office should be contacted within the hour of the incident.

NOTE: Any equipment involved in an accident resulting in an immediate fatality is not to be moved until a representative of OSHA investigates the accident and authorizes removal. If, however, it is necessary to move the equipment to prevent further accidents or to remove the victim, the equipment may be moved as required.

3. NEAR-MISS (likelihood of personal injury or property damage)
To the greatest extent possible, all "near-miss" accidents will be investigated by Corporate Management (if situation warrants), and the Foreman. Documentation will be made on the firm's accident investigation form. A near-miss accident is defined as an unplanned event where damage resulted to equipment but there was no personal injury to employees OR where damage did not result but the likelihood of personal injury to the employee was great. If the conditions that permitted the near miss or "close-call" to exist are not eliminated, they will continue to be available to cause additional accidents that could eventually result in personal injury to the employee.

Accident Investigation Kits should include the following:

- Camera equipment
- First aid kit
- Tape recorder
- Gloves
- Tape measure
- Large envelopes
- High visibility tape (barrier)
- Emergency Phone Numbers
- Clipboard, pen and graph paper
- Injury Report forms
- Scissors
- Scotch tape
- Sample containers with labels
- Personal protective equipment
- Flashlight
- Tags for labeling

APPENDIX 12.1
WORKERS COMPENSATION – FIRST REPORT OF INJURY OR ILLNESS

General

Employer (Name & Address incl. zip)		Carrier/Administrator Claim Number	Report Purpose Code
		Jurisdiction	Jurisdiction Claim No.
		Insured Report No.	
		Employer's Location Address (if different)	Location No.
Sic Code	Employer FEIN		Phone No.

Carrier/Claims Admin

Carrier (Name, Address & Phone Number) Alaska National Insurance Company 851 N. Hickory Ave Ste 100 Meridian, ID 83642		Policy Period To ☐ Check if self insured	Claims Admin (Name, Address & Phone Number) Alaska National Insurance Company 851 N. Hickory Ave Ste 100 Meridian, ID 83642
Carrier FEIN	Policy Number or Self-Insured Number		Administrator FEIN
Agent Name & Code Number			

Employee

Legal Name (Last, First, Middle)	Birth Date	Social Security Number		Date Hired	State of Hire
Address (Incl. Zip)	Sex: ☐ Male ☐ Female ☐ Unknown	Marital Status: ☐ Unmarried/ Single/Div. ☐ Married ☐ Separated		Occupation/Job Title	
				Employment Status	
Phone	No. of Dependents	☐ Unknown		NCCI Class Code	
Wage Rate $ ☐ Day ☐ Week	☐ Month ☐ Other	# Days Worked/WK # Hrs Worked per Day		Full Pay for Date of Injury? ☐ Yes ☐ No Did Salary Continue? ☐ Yes ☐ No	

Occurrence

Time Employee Began Work ☐ AM ☐ PM	Date of Injury or Illness	Time Occurred ☐ AM ☐ PM	Last Work Date	Date Employer Notified	Date Disability Began	
Employer Contact Name/Phone Number		Type of Illness/Injury		Part of Body Affected		
Did Injury/Illness Exposure Occur on Employer's Premises? Yes ☐ No ☐		Type of Illness/Injury Code		Part of Body Affected Code		
Department or location where accident or illness exposure occurred		All Equipment, Materials, or Chemicals Employee Using upon Occurrence				
Specific Activity Employee Engaged in at Time of Occurrence		Work Process the Employee Was Engaged in at Time of Occurrence				
How injury or illness/abnormal health condition occurred. Describe the sequence of events and include any objects or substances that directly injured the employee or made the employee ill.					Cause of Injury Code	
Date Returned to Work	If Fatal, Date of Death	Were Safeguards or Safety Equipment Provided? ☐ Yes ☐ No				
		Were they used? ☐ Yes ☐ No				

Treatment

Physician/Health Care Provider (Name & Address)	Hospital (Name & Address)	Initial Treatment 0 ☐ No Medical Treatment 1 ☐ Minor: By Employer 2 ☐ Minor Clinic/Hosp 3 ☐ Emergency Care 4 ☐ Hospitalized – 24 hr. 5 ☐ Anticipated Major Med/Lost Time

Other

Signature of Injured Employee, or Signature on File, Date		Witness to Accident (Name & Phone Number)	
Date Administrator Notified	Date Prepared	Preparer's Name & Title	Preparer's Phone Number

APPENDIX 12.2

Donahue McNamara Steel

Accident/Injury Checklist

1. Date of Incident _____ Project Name _____
2. Employee's name (print) _____
3. Accident/Injury was reported to the foreman/supervisor Yes _____ No _____
4. When? _____
5. Has DMS First Report of Injury been completed and submitted to DMS main office Yes_____ No_____
6. Were eyewitness reports written and sent into main office? Yes _____ No _____
7. Did individual require medical treatment Yes_____ No_____

   If No, you may skip the rest of this form. Otherwise, please continue.
8. If medical treatment was required, when was the Workers Compensation First Report of Injury filled out and submitted to DMS main office? _____
   Date submitted to DMS office _____
9. Were Photographs or diagrams taken or created and sent to main office? Yes_____ No _____ When _____
10. Were receipts and reports from medical facility (hospital, clinic, etc.) received by DMS Supervisor? Yes _____ No _____
11. Were receipts and reports sent to main office? Yes _____ No _____
12. When? _____
13. Is follow-up examination recommended or required by medical facility? Yes _____ No _____
    In how many days? _____
14. Have you asked the employee if he has completed his follow-up appointment? Yes ____ No____
15. Have you received the follow up report and submitted it to the main office? Yes _____ No_____ When_____
16. **DMS requires employees to attend follow-up appointments if recommended or required by medical facility.** If employee refuses to attend follow-up, he must complete and sign the following:

I _____ have been advised by the medical attendant at my appointment on _____ to follow up with him/her in _____days. **But I do not plan to follow up with my appointment**. Employee's Signature _____ Date _____

Supervisor _____Date _____

Supervisor's printed name_____

Form created 7/7/16

APPENDIX 12.3a

Donahue McNamara Steel

Incident Report

Time of Incident: _____ Date Reported: _____

Date of Incident: _____ Project Name: _____

1. Name: _____
2. Age: _____ Sex: _____
3. Job Title: _____
4. Date/Time loss began: _____
5. Date of hire: _____
6. Job at time of Incident: _____
7. Length of time in job: _____
8. Was first-aid required? Yes No
9. Lost time involved? Yes No
10. Property damage? Yes No
11. How did Incident occur? _____
_____
_____
_____
12. Was personal protective equipment needed? Yes No
13. Was protective equipment used? Yes No
14. Describe damage: _____
_____
_____
15. What unsafe acts contributed to the Incident? _____
_____

16. Corrective action to be taken for unsafe acts: (Discipline, Training, etc.) _____
_____
_____

17. What unsafe conditions contributed to the Incident? _____
_____

18. Had the condition been reported previously? Yes No

19. Who was the condition reported to? _____

20. Was the Incident caused by anyone not employed by Donahue McNamara Steel? Yes No

21. Who? _____

22. Witnesses: _____
_____
(Attach a written statement from witnesses)

23. Corrective actions for unsafe acts: _____
_____

24. Actions to prevent incident recurrence: _____
_____
_____

25. Person responsible for corrective action: _____

26. Dates to have corrective actions completed: _____
_____
_____

_____ _____
Foreman Date

Forward copy to Donahue McNamara Steel Corporate Office

APPENDIX 12.3b

Donahue McNamara Steel

Near Miss Report

DATE_____ TIME OF INCIDENT_____ FACILITY_____

LOCATION WHERE NEAR MISS OCCURRED:_____

_____

DESCRIPTION OF EVENT: _____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

CORRECTIVE ACTION:_____

_____

_____

_____

_____

_____

_____

EMPLOYEE NAME (PRINT)

_____

EMPLOYEE SIGNATURE/DATE

_____

MANAGER SIGNATURE/DATE

_____

SAFETY OFFICER SIGNATURE/DATE

APPENDIX 13

Donahue McNamara Steel

Occupational Injury and Illness Record Keeping

A. Purpose: In accordance with applicable requirement of the OSHA standards, corporate management will ensure the appropriate records are kept as follows:

1. Maintain a Log and Summary of Occupational Injuries and Illness on OSHA 300 form. Recordable cases include:
   a) Every occupational death.
   b) Every occupational illness.
   c) Every occupational injury that involves:
      - Unconsciousness;
      - Inability to perform all phases of the regular job;
      - Inability to work full time on a regular job;
      - Temporary assignments to another job;
      - Medical treatment OTHER than first aid.

2. Keep copies of all reports generated when an employee is injured on the job.

3. During the month of February, post the completed Summary portion of the OSHA 300 form for the previous year.

4. Maintain records for five years following the year to which they relate.

5. Enter each recordable injury and illness on the log as early as practicable, but no later than six working days after receiving the information that a recordable case has occurred.

6. Copies of the OSHA 300 logs are to be provided to each job location.

B. Responsibility: The individual or function responsible for maintaining records and ensuring proper posting is the Foreman of the project.

APPENDIX 14

Donahue McNamara Steel

OSHA Inspection Form

1. Who did the inspector first contact on the job-site?

Name: _____ Position: _____

2. Did the inspector talk with workers/other personnel before showing his/her credentials?
   Yes_____ No_____

3. Did the inspector take any pictures before he/she arrived and introduced himself/herself?
   Yes_____ No_____

4. Were other company's personnel working at the job-site, and did the inspector ask for them to be present at the opening conference? Yes____ No____

5. Name the other companies inspected and whether subcontractors, vendors, or others:
   _____
_____
_____

6. Who was present at the opening conference? (Include those in 5 above if they were present): _____
_____
_____
_____

7. What was the purpose of the visit as explained by the inspector?
_____
_____
_____

8. Was there a complaint? _____
9. Were you given a copy of the complaint? Yes _____ No _____

10. Did the inspector review record keeping under OSHA?
    Yes _____ No _____

11. How were employee representatives selected? _____
_____

12. What trades did they represent? _____
_____
_____

13. Other Comments: _____
_____
_____

14. Who was present during the actual site inspection? _____
_____
_____
_____

15. Where they paid for the time spent? Yes _____ No _____

16. Comments by the inspector? Briefly list them. _____
_____
_____
_____
_____

17. Were pictures taken? Yes _____ No _____.

Write down exact locations and of what? _____
_____
_____

18. Was any portion of the job shut down? Yes _____ No _____

If "Yes", for how long? _____
Comments: _____
_____

19. Who was present at the closing conference? _____
_____
_____
_____

20. Did the inspector allege that violations were found? Yes ____ No ____

21. If yes, name them:

SERIOUS: _____
_____

_____
_____

OTHER-THAN-SERIOUS: _____
_____
_____
_____

COMMENTS:_____
_____
_____
_____
_____

TIME SCHEDULE OF INSPECTION

Date inspector arrived: _____ Time inspector arrived: _____

Time opening conference began: _____

Time opening conference ended: _____

Time inspection began: _____

Time inspection ended: _____

Time closing conference began: _____

Time closing conference ended: _____

Site location: _____

Signed: _____

Date: _____

Appendix 15.1

Donahue McNamara Steel

Hazardous Communication Written Program

The hazard communication standard (HCS) is a law enacted by OSHA to protect workers against chemical exposures at the workplace. The intent of this law is to reduce health risks by use of safety equipment, training and informing employees of the potential hazards.

This program has been prepared to comply with the requirements of the Federal OSHA standard 1926.59 and to ensure that information necessary for the safe use, handling and storage of hazardous chemicals is provided to and made available to employers and employees.

Information on the Donahue McNamara Steel Hazardous Communication Written Program or on a specific SDS can be obtained by contacting the job Foreman or by contacting the corporate office in Boise, Idaho.

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

The four basic requirements of the hazard communication standard are:

1. All containers are labeled to identify the product that it contains. The integrity of labels on original containers is to be maintained. This includes secondary containers. Secondary containers are to have appropriate labels that include product identification and hazard warnings.
2. Safety data sheets (SDS) are available for all products used in the workplace. The SDS should be provided to the Donahue McNamara Steel Foreman a minimum of 2 weeks prior to any work with the product on the project.
3. Employees are informed and trained on the standard.
4. Employees have been furnished with and trained in the use of personal protective equipment (PPE) required for use in the event that they are exposed to a potentially hazardous product.

Chemical Inventory

Donahue McNamara Steel maintains an inventory of all known chemicals in use on this work site. A chemical inventory is available from the Project Foreman.

Hazardous chemicals brought onto the work site by Donahue McNamara Steel will be included on the hazardous chemical inventory list.

It is the responsibility of each Donahue McNamara Steel subcontractor to work within the OSHA guidelines. Each contractor is responsible for the protection of their employees and compliance with the standard. In addition, it is the responsibility of the subcontractor to maintain their own inventory of chemicals on the Donahue McNamara Steel project site. The complete and updated listing must also be supplied to the Donahue McNamara Steel Project Foreman or Project Manager.

Container Labeling

1. All chemicals on site will be stored in their original or approved containers with a proper label attached, except small quantities for immediate use. Any container not properly labeled will be given to the Project Foreman for labeling or proper disposal.
2. Workers may place a chemical into a smaller (one gallon or less) container. This container is for immediate use. Any chemical remaining after work is completed must be returned to the original container or to the Project Foreman for proper handling.
3. No unmarked containers of any size are to be left in the work area unattended.
4. Donahue McNamara Steel will rely on the manufacturer and or supplier applied labels whenever possible, and project staff will ensure that these labels are maintained. Containers that are not labeled or on which the manufacture's label has been removed will be re-labeled or removed from the site.
5. Donahue McNamara Steel will ensure that each container is labeled with the identity of the hazardous chemical contained and any appropriate hazard warnings.

Safety Data Sheets

1. Employees working with hazardous chemicals may request a copy of the safety data sheets (SDS). Requests to review a SDS should be made to the Project Foreman. The SDS must be available to the employee within one (normal) work day shift.
2. SDS should be available on the site. The standard chemical reference may also be available on the site to provide immediate reference to chemical safety information.
3. All subcontractors have the responsibility to maintain their own inventory of chemicals being used on the Donahue McNamara Steel project site. The complete and updated listing must also be supplied to the Donahue McNamara Steel Project Foreman or Project Manager, for inclusion in the project SDS binder(s).

Employee Training

Employees will be trained to work safely with hazardous chemicals that they may encounter. Employee training will include:

1. Methods that may be used to detect a release of a hazardous chemical(s) in the work place.
2. Physical and health hazards associated with chemicals.
3. Protective measures to be taken.
4. Safe work practices, emergency responses and use of personal protective equipment.

5. Information on the Hazardous Communication Standard including:
    - Labeling and warning systems.
    - An explanation of Material Safety Data Sheets.

Personal Protective Equipment (PPE)

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

Emergency Response

1. Any incident of overexposure or spill of a hazardous chemical/substance must be reported to the Project Foreman immediately.
2. The Foreman will be responsible for insuring that proper emergency response actions are taken to care for the employee or respond to leak/spill situations.

Hazards of Non-Routine Tasks

1. Foreman will inform employees of any special tasks that may arise that could involve possible exposure to hazardous chemicals.
2. Review of safe work procedures and use of required PPE will be conducted prior to the start of any confined space tasks.

3. Where necessary, confined and hazardous atmosphere areas will be posted to indicate the nature of the hazards involved.

Informing Other Employers

1. Other on-site employers are required to adhere to the provisions of the Hazard Communication Standard.

2. Information of hazardous chemicals known to be present will be exchanged with other employers during the pre-construction meeting. Employers will be responsible for providing necessary information to their employees.

3. Other on site employers will be provided with a copy of the Donahue McNamara Steel Hazard Communication Program.

4. Donahue McNamara Steel will supply a central location for MSDS, so all employees; of all contractors on a specific project (when Donahue McNamara Steel is the general contractor) will have access. This location will be made known to all workers on the site.

Posting

Donahue McNamara Steel has posted information for employees at this job site concerning the Hazard Communication Standard. This information can be found at the project office.

APPENDIX 15.2

Donahue McNamara Steel

List of Hazardous Chemicals

UPC Code	Trade Name	Chemical Hazard	Location

APPENDIX 16

Donahue McNamara Steel

Sample SDS Request Letter

Date:

Manufacturer/Distributor
Address
City, State Zip Code

Subject: Safety Data Sheet

Please send us two Safety Data Sheet (SDS) for the products below:

1.

2.

3.

The SDS is for our hazard communication program required by the Hazard Communication Standard. Please make sure each SDS meets the requirements of 29 CFR 1910.1200, OSHA. Donahue McNamara Steel recognizes a complete and accurate OSHA Form 174 SDS as complying with state requirements. As part of our program, we require that all Hazardous Materials be properly labeled in accordance with current OSHA law.

Thank you for your assistance.

Sincerely,

* File copy of this letter in the Donahue McNamara Steel SDS Book.

APPENDIX 17

Donahue McNamara Steel

Employee Chemical Hazard Communication Training

Acknowledgment

I, _____, have attended the Donahue McNamara Steel Chemical Hazard Communication Training orientation, and understand the requirements and responsibilities of the HAZCOM program.

_____

Employee's Signature

_____

Today's Date

_____

Project Manager or Foreman's Signature

_____

Today's Date

Appendix 18.1

Donahue McNamara Steel

CDL & Professional Drivers Checklist

COMPANY_____ Phone_____

Address_____ Contact_____

_____ Years in Business_____

Commodities Hauled_____

Hazardous Materials? YES NO

If Yes, Do employees Receive HAZMAT Training YES NO

Equipment

Nature of Business:	Log	Interstate	Local	Farm		

Number of Trucks:

Tractor Trailer:	
Tractor 2-Trailers	
Tractor Triple	
Tow Truck	
Flat Bed Truck	
Other	
Oldest Truck How Many?	
Newest Truck How Many?	

Radius of Travel

Shortest	
Longest	
Total annual miles (approx.)	

Maintenance

	YES	NO
Do you have a preventative maintenance schedule?		
If Yes, please describe frequency of Maintenance		
Are separate files kept for each vehicle?		
Are vehicles inspected daily?		
Are vehicles inspected yearly? Inspections current?		

Do drivers inspect their own brakes? Are they trained? Training documented?		
Do drivers fuel their own trucks? Are they trained? Training documented?		
PPE required? List:		

Personnel

Number of Employees	
Drivers	
Maintenance	
General	
Who is responsible for hiring drivers?	
Who is responsible for terminating drivers?	
Is there written hiring criteria?	
Are references checked before hiring? On File?	
Are MVR's required & renewed before hire? On File?	
Are drivers' files complete and current? On File?	
All drivers drug tested?	
Who administers the program?	

Safety Program

	YES	NO
Do you have a written safety policy?		
Do you have a written disciplinary procedure? If YES, What is it?		
Do you have a written speed policy?		
Do you have a "NO RIDER" policy?		
Do you have a written employee drug policy?		
Do you have a safety committee? Meeting's Agenda on file?		
Do you provide driver orientation training? Documented?		
Do you give new employees road tests before hiring?		

On file?		
Do you provide equipment orientation?		
Do you have company safety materials, newsletter, etc... List:		
Do you provide training for endorsements? HAZCOM HAZWOPER Brake		
Number of accidents		
This year?		
Last year?		
All accidents investigated? By whom:		
Do you have an accident review committee? Findings kept on file?		
Separate files for each accident maintained?		

Safe Stat Rating _____

DOT Recordable Accidents _____

Incident Rate _____

E-Mod _____

Comments:

_____

_____

_____

Appendix 18.2

Donahue McNamara Steel

Vehicle Inspection - CDL

Company:_____ Truck I.D.:_____

Date of Inspection:_____ Inspector:_____ Odometer Reading:_____

- ☐ Air Compressor
- ☐ Air Lines
- ☐ Battery
- ☐ Body
- ☐ Brake Accessories
- ☐ Brakes, Parking
- ☐ Brakes, Service
- ☐ Clutch
- ☐ Coupling Devices
- ☐ Defroster/Heater
- ☐ Drive Line
- ☐ Engine
- ☐ Exhaust
- ☐ Fifth Wheel
- ☐ Frame & Assembly
- ☐ Front Axle
- ☐ Fuel Tanks
- ☐ Generator
- ☐ Horn
- ☐ Lights, Head - Stop
- ☐ Lights, Tail - Dash
- ☐ Lights, Turn Signals
- ☐ Mirrors
- ☐ Muffler(s)
- ☐ Oil Pressure
- ☐ Radiator
- ☐ Rear End
- ☐ Reflectors (cab)
- ☐ Safety Equip - Fire Extinguisher
- ☐ Safety Equip - Reflective Triangles
- ☐ Safety Equip - Flags/Flares/Fusees
- ☐ Safety Equip - Spare Bulbs/Fuses
- ☐ Safety Equip - Spare Seal Beam
- ☐ Suspension System
- ☐ Starter
- ☐ Steering
- ☐ Tachograph
- ☐ Tires
- ☐ Tire Chains
- ☐ Transmission
- ☐ Wheels and Rims
- ☐ Windows
- ☐ Windshield
- ☐ Other:

*Trailer(s) #(s)*_____

- ☐ Brake Connections
- ☐ Brakes
- ☐ Coupling Devices
- ☐ Coupling (King) Pin
- ☐ Doors
- ☐ Hitch
- ☐ Landing Gear
- ☐ Lights - All
- ☐ Roof
- ☐ Suspension System
- ☐ Tarpaulin
- ☐ Tires
- ☐ Wheels & Rims
- ☐ Other:
- ☐ Other:

Remarks:_____

_____

_____

☐ CONDITION OF THE ABOVE VEHICLE IS SATISFACTORY

*Drivers Signature:*_____

*Date*_____

☐ ABOVE DEFECTS CORRECTED

☐ ABOVE DEFECTS NEED NOT BE CORRECTED FOR SAFE OPERATION OF VEHICLE

*Inspectors Signature:*_____

*Date*_____

*Drivers Signature:*_____

*Date*_____

Appendix 19

Donahue McNamara Steel

Hot work Permit

Contractor: _____ Date: _____

Project: _____

Work Location: (Be Specific) _____

Individual available on site who is responsible to monitor employee safety and implementation of this plan: _____

ATTENTION

Before approval of any hot work plan, A Donahue McNamara Steel representative will inspect the work area and confirm that precautions have been taken to prevent fire in accordance with NFP.A No 51B.

PRECAUTIONS:

1. Cutting and Welding Equipment in good working condition.
2. Fire extinguisher available within 25 feet. ☐ **TYPE ABC** ☐ **OTHER: _____**
3. Local Fire Department phone # posted.
4. Floors swept clean of combustible material.
5. Combustible floors wetted down, and/or shielded.
6. No flammable materials stored near work area.
7. Wall and floor opening covered.
8. Covers suspended beneath work to collect sparks.
9. Atmospheric monitoring completed within 35 feet of work.

WORK IN CONFINED SPACE

1. Confined Space Permit.
2. Equipment cleaned of all liquid combustibles.
3. Containers purged of vapors.

FIRE WATCH

1. Provided during and 30 minutes after work process finished.
2. Fire extinguisher and water immediately available.

Special Precautions

Final check-up is to be made 30 minutes after completion of any operation unless a formal designated fire watch person is assigned.

The location where this work is to be done has been examined, necessary precautions taken, and permission is granted for this work.

Plan Issue Date: _____ **Expires:** _____

Person(s) performing Hot Work: _____

Person(s) Performing Fire Watch: _____

Signed: _____

(Individual responsible for authorizing Hot Work)

FINAL CHECK

Work area and all adjacent areas to which sparks and heat might have spread (including floor above, below and opposite sides of walls) were inspected 30 minutes after the work was completed and found fire safe.

Signed: _____ Time/Date: _____

(Individual responsible for authorizing Hot Work)

Appendix 20

Donahue McNamara Steel

Lead Written Program

A. Permissible Exposure Limit (PEL)

The OSHA standard sets a permissible exposure limit (PEL) of 50 micrograms of lead per cubic meter of air (50uglm(3)), averaged over an 8-hour workday that is referred to as a time-weighted average (TWA). This is the highest level of lead in air to which an employee may be permissibly exposed over an 8-hour workday. However, since this is an 8-hour average, short exposures above the PEL are permitted so long as for each 8-hour workday the average exposure does not exceed this level.

B. Exposure Assessment

If lead is present in the workplace in any quantity, Donahue McNamara Steel is required to make an initial determination of whether any employee's exposure to lead exceeds the action level (30ug/m(3) averaged over an 8-hour day). Employee exposure is that exposure which would occur if the employee were not using a respirator. This initial determination requires Donahue McNamara Steel to monitor workers' exposure, unless Donahue McNamara Steel has objective data that can demonstrate conclusively that no employee will be exposed to lead in excess of the action level. Where objective data is in lieu of actual monitoring, Donahue McNamara Steel must establish and maintain an accurate record documenting its relevancy in assessing exposure levels for current job conditions. If such objective data is available, Donahue McNamara Steel need proceed no further on employee exposure assessment until such time that the conditions have changed and the determination is no longer valid. Objective data may be compiled from various sources, e.g., insurance companies and trade associations and information from suppliers or exposure data collected from similar operations. Objective data may also be comprised from previously collected sampling data included in the monitoring area. If it cannot be determined through using objective data that the employee exposure is less than the action level, Donahue McNamara Steel must conduct monitoring or must rely on relevant previous personal sampling, if available. Where monitoring is required for the initial determination, it may be limited to a representative number of employees who are reasonably expected to have the highest exposure levels. If Donahue McNamara Steel has conducted appropriate air sampling for lead in the past 12 months, Donahue McNamara Steel may use these results, provided they are applicable to the same employee tasks and exposure conditions and meet the requirements for accuracy as specified in the standard. If this initial determination shows that a reasonable possibility exists that any employee may be exposed, without regard to respirators, over the action level, Donahue McNamara Steel must set up an air monitoring program to determine the exposure level representative of each employee exposed to lead at the workplace. In carrying out this air monitoring program, Donahue McNamara Steel is not required to monitor the exposure of every employee, but Donahue McNamara Steel must monitor a representative number of

employees and job types. Enough sampling must be done to enable each employee's exposure level to be reasonably representing full shift exposure. In addition, these air samples must be taken under conditions that represent each employee's regular, daily exposure to lead. The OSHA standard lists certain tasks which may likely result in exposure to lead in excess of the PEL and, in some cases, exposures in excess of 50 times the PEL.

Until DMS performs an employee exposure assessment as required above, and documents that the employee's lead exposure is not above the PEL, Donahue McNamara Steel will treat the employee as if the employee were exposed to lead above the PEL and not in excess of 500 ug/m(3) or (10 x PEL) and will implement employee protective measures as described below. The tasks covered by this requirement are:

1. Locations where lead containing coatings or paint are present.
2. Manual demolition of structures (e.g., drywall), manual scraping, manual sanding, heat gun applications, and power tool cleaning with dust collection system.
3. Spray painting with lead paint.

Until DMS performs an employee exposure assessment as required above and documents that the employee performing any of the listed tasks is not exposed in excess of 500 ug/m(3), Donahue McNamara Steel will treat the employee as if the employee were exposed to lead in excess of 500 ug/m(3) and will implement employee protective measures as described below. Where DMS does establish that the employee is exposed to levels below 500 ug/m(3), DMS may provide the exposed employee with the appropriate respirator prescribed for such use at such lower exposures, in accordance with Table 1 of this section. The tasks covered by these requirements are:

1. Using lead containing mortar and lead burning.
2. Where lead containing coatings or paint are present, rivet busting, power tool cleaning without dust collection systems, clean-up activities where dry expendable abrasives are used, and abrasive blasting enclosure movement and removal.

Until DMS performs an employee exposure assessment as required above and documents that the employee performing any of the listed tasks is not exposed to lead in excess of 2,500 ug/m(3) (5 x PEL), the employer will treat the employee as if the employee were exposed to lead in excess of 2,500 ug/m(3) and will implement employee protective measures. Where Donahue McNamara Steel does establish that the employee is exposed to levels of lead below 2,500 ug/m(3), Donahue McNamara Steel may provide the exposed employee with the appropriate respirator prescribed for use at such lower exposure, in accordance with Table I of this section. Interim protection as described in this paragraph is required where lead containing coatings or paint are present on structures when performing:

1. Abrasive blasting.
2. Welding.
3. Cutting.
4. Torch burning.

If an employee is performing any of these tasks, DMS must provide that employee with the appropriate respiratory protection, protective clothing and equipment, change areas, hand washing facilities, biological monitoring, and training until such time that an exposure

assessment is conducted that demonstrates that employee's exposure is below the PEL. If an employee is exposed to lead, and air sampling is performed, Donahue McNamara Steel is required to notify employee in writing within 5 working days of the air monitoring result that represents the employee's exposure. If the results indicate that the employee's exposure exceeds the PEL (without regard to employee's use of a respirator), DMS must also notify employee of this in writing, and provide employee with a description of the corrective action that has been taken or will be taken to reduce the employee's exposure. Employee's exposure must be rechecked by monitoring, at least every six (6) months if the employee's exposure is at or over the action level but below the PEL. Donahue McNamara Steel may discontinue monitoring for employees if two (2) consecutive measurements, taken seven (7) days apart, are at or below the action level. Air monitoring must be repeated every three (3) months if the employee is exposed over the PEL. DMS must continue monitoring for employees at this frequency until two (2) consecutive measurements, taken seven (7) days apart, are below the PEL but above the action level, at which time DMS must repeat monitoring of the employee's exposure every six (6) months and may discontinue monitoring only after the employee's exposure level drops below the action level. However, whenever there is a change of equipment, process, control, or personnel or a new type of job is added at the employee's workplace that may result in new or additional exposure to lead, DMS must perform additional monitoring.

C. Methods of Compliance

DMS is required to assure that no employee is exposed to lead in excess of the PEL as an 8-hour TWA. The OSHA standard for lead in construction requires employers to institute engineering and work practice controls including administrative controls to the extent feasible to reduce employee exposure to lead. Where such controls are feasible but not adequate to reduce exposures below the PEL, they must be used to reduce exposures to the lowest level that can be accomplished by these means and then supplemented with appropriate respiratory protection. DMS is required to develop and implement a written compliance program prior to the commencement of any job where employee exposures may reach the PEL as an 8-hour TWA. The OSHA standard identifies the various elements that must be included in the plan. In addition, Donahue McNamara Steel' compliance plan must specify the means that will be used to achieve compliance and where controls are required, including any engineering plans or studies that have been used to select the control methods. If administrative controls involving job rotation are used to reduce employee exposure to lead, the job rotation schedule must be included in the compliance plan. The plan also must detail the type of protective clothing and equipment, including respirators, and housekeeping and hygiene practices that will be used to protect the employee from the adverse effects of exposure to lead. The written compliance program must be made available, upon request, to affected employees and their designated representatives. Finally, the plan must be reviewed and updated every six months to assure it reflects the current status in exposure control.

D. Respiratory Protection

DMS is required to provide and assure employee's proper use of respirators when employee's exposure to lead is not controlled below the PEL by other means. DMS must pay the cost of

the respirator when the PEL level is above the exposure limit. Further, DMS is also required to provide an employee a respirator even if employee's air exposure level is not above the PEL whenever an employee requests one. The employee might request a respirator when, for example, the employee has received medical advice that the employee's lead absorption should be reduced, or if the employee intends to have children in the near future, and wants to reduce the level of lead in the employee's body to minimize adverse reproductive effects. While respirators are the least satisfactory means of controlling employee's exposure, they are capable of providing significant protection if properly chosen, fitted, worn, cleaned, maintained, and replaced when they stop providing adequate protection. Donahue McNamara Steel is required to select respirators from the types listed in Table I of the Respiratory Protection of the OSHA standard. Any respirator chosen must be approved by the Mine Safety Health Administration (MSHA), or the National Institute for Occupational Safety and Health (NIOSH). This respirator selection table will enable DMS to choose a type of respirator that will give the employee the proper amount of protection based on the employee's airborne lead exposure. DMS may select a type of respirator that provides greater protection than that required by the OSHA standard; that is one recommended for higher concentrations of lead than is present in the workplace.

DMS has a Respiratory Protection Program. This program includes written procedures for the proper selection, use, cleaning, storage, and maintenance of respirators. DMS must assure that employee's face piece fit properly. Proper fit of a respirator face piece is critical. Obtaining proper fit on each employee may require DMS to make available two or three different mask types. In order to assure that the employee's respirator fits properly and that the face piece leakage is minimized, DMS must give employee either a qualitative fit test or a quantitative fit test (if employee uses a negative pressure respirator).

Any respirator which has a filter, cartridge, or canister which cleans the air before the employee breathes, and which requires the force of the employee's inhalation to draw the air through the filtering element is a negative pressure respirator.

A positive pressure respirator supplies air to the employee directly. A quantitative fit test uses a sophisticated machine to measure the amount, if any, of test material that leaks from the face piece of the employee's respirator. The employee must also receive from DMS proper training in the use of respirators.

DMS must test the effectiveness of the employee's negative pressure respirator initially and at least once every six (6) months thereafter with a "qualitative fit test". In a qualitative fit test, the fit of the face piece is checked by seeing if the employee can smell substance placed outside the respirator. The OSHA standard provides that if the employee's respirator uses filter elements, the employee must be given the opportunity to change the filter element whenever an increase in breathing resistance is detected. The employee also must be permitted to periodically leave their work area to wash their face and respirator face piece whenever necessary to prevent skin irritation. If the employee is ever having difficulty in breathing during the fit test or while using a respirator, DMS must make a medical examination

available to the employee to determine whether the employee can safely wear a respirator. The result of this examination may be to give the employee a positive pressure respirator (which reduces breathing resistance) or to provide alternative means of protection.

E. Protective Work Clothing and Equipment

If the employee is exposed to lead above the PEL as an 8-hour TWA, without regard to employee's use of a respirator, or if the employee is exposed to lead compounds such as lead arsenate or lead azide, which can cause skin and eye irritation, Donahue McNamara Steel must provide employee with protective work clothing and equipment appropriate for the hazard. If work clothing is provided, it must be provided in a clean and dry condition at least weekly, and daily if the airborne exposure to lead is greater than 200 ug/m(3). Appropriate protective work clothing and equipment can include coveralls or similar full-body work clothing, gloves, hats, shoes, or disposable shoe coverlets, and face shields or vented goggles. DMS is required to provide all such equipment at no cost to the employee. In addition, DMS is responsible for providing repairs and replacement as necessary, and also is responsible for the cleaning, laundry or disposal of protective clothing and equipment. The OSHA standard requires that DMS assure that the employees follow good work practices when the employees are working in areas where employee exposure to lead may exceed the PEL.

The following procedures concerning protective clothing and equipment should be observed prior to beginning work. (Where applicable)

1. Designated changing areas.
2. Use work garments of appropriate protective gear, including respirators prior to entering work area.
3. Store any clothing not worn under protective clothing in a designated changing area.

Employees should follow these procedures upon leaving the work area:

1. HEPA vacuum heavily contaminated protective clothing while still being worn. At no time may lead be removed from protective clothing by any means that result in uncontrolled dispersal of lead into the air.
2. Remove shoe covers and leave them in the work area.
3. Remove protective clothing and gear in the dirty area of the designated changing area. Remove protective coveralls by carefully rolling down the garment to reduce exposure to dust.
4. Remove respirator last.
5. Wash hands and face.

Employees should follow these procedures upon finishing work for the day in addition to the procedures described above:

1. Place disposable coveralls and shoe covers with the abatement waste. (Where Applicable)
2. Contaminated clothing that is to be cleaned, laundered or disposed of must be placed in closed containers in the change room.
3. Clean protective gear, including respirators, in accordance with the OSHA standard.

4. Wash hands and face again. If showers are available, take a shower and wash hair. If shower is not available at the work site, shower and wash hair immediately at home.

F. Housekeeping

Donahue McNamara Steel must establish a housekeeping program sufficient to maintain all surfaces as free as practical of accumulation of lead dust. Vacuuming is the preferred method of meeting this requirement. The use of compressed air to clean the floor and other is generally prohibited unless the removal with compressed air is done in conjunction with ventilation systems designed to contain dispersal of lead dust. Dry or wet sweeping, shoveling, or brushing may not be used except where vacuuming or other equally effective methods have been tried and do not work. Vacuums must be equipped with a special filter called a high-efficiency particulate air (HEPA) filter and emptied in a manner that minimizes the reentry of lead into the work area.

G. Hygiene Facilities and Practices

The OSHA standard requires that hand washing facilities be provided where occupational exposure to lead occurs. In addition, change areas, showers, and lunchrooms or eating areas are to be made available to workers exposed to lead above the PEL. DMS must assure that except in these facilities, food and beverages are not present or consumed, tobacco products are not present or used, and cosmetics are not applied, where airborne exposures are above the PEL. Change rooms provided by DMS must be equipped with separate storage facilities for protective clothing and equipment and street clothes to avoid cross- contamination. After showering, no required protective clothing and equipment worn during the shift may be worn home. It is important that the contaminated clothing and equipment be removed in the change areas and not be worn home or the employee will extend the employee's exposure to the employee's family since lead from the employee's clothing can accumulate in the employee's car, house, etc. Lunchrooms or eating areas may not be entered with protective clothing or equipment unless the surface dust has been removed by vacuuming, downdraft booth, or other cleaning method. Finally, employees exposed above the PEL must wash both their hands and faces prior to eating, drinking, smoking, or applying cosmetics. All of the facilities and hygiene practices above are essential to minimize additional sources of lead absorption from inhalation or ingestion of lead that may accumulate on the employee, the employee's clothes or on the employee's possessions. Strict compliance with these provisions can virtually eliminate several sources of lead exposure which significantly contribute to excessive lead absorption.

H. Employee Information and Training

Donahue McNamara Steel is required to provide an information and training program for all employees exposed to lead above the action level or who may suffer skin or eye irritation from lead compounds such as lead arsenate and lead azide. The program requires training these employees regarding the specific hazards associated with their work environment, protective measures which can be taken, including the contents of any compliance plan in effect, the danger of lead to their bodies (including their reproductive systems), and their rights under the law. All employees must be trained prior to initial assignment to the areas where there is a

possibility of exposure over the action level. This training program must also be provided at least annually thereafter unless further exposure above the action level will not occur.

I. Signs

The OSHA standard requires that the following warning signs be posted in work areas where the exposure to lead exceeds the PEL:

1. Warning Lead Work.
2. Area Poison.
3. No Smoking or Eating.

These signs are to be posted and maintained in a manner which assures that the legend is readily visible.

J. Record Keeping

Donahue McNamara Steel is required to keep all records of exposure monitoring for airborne lead. These records must include the name and job classification of employees measured, details of the sampling and analytical techniques, the results of the sampling, and the type of respiratory protection being worn by the person sampled. Such records are to be retained for at least 30 years. DMS is also required to keep all records of biological monitoring and medical examination results. These records must include the names of the employees, the physician's written opinion, and a copy of the results of the examination. Medical records must be preserved and maintained for the duration of the employment plus 30 years. However, if the employee's duration of employment is less than one (1) year, the employer need not retain that employee's medical records beyond the period of employment if they are provided to the employee upon termination of employment. Record keeping is required if the employee is temporarily removed from the employee's job under the medical removal protection program. This record must include the employee's name and social security number, the date of the employee's removal and return, how the removal was or is being accomplished, and whether or not the reason for the removal was an elevated blood lead level. Donahue McNamara Steel is required to keep each medical removal record only for as long as the duration of an employee's employment. The OSHA standard requires that if the employee requests to see or copy environmental monitoring, blood lead levels monitoring, or medical removal records, they must be made available to the employee or to a representative that they authorize. Medical records other than the BLL's must also be provided upon request to the employee, to the employee's physician or any other person who the employee may specifically designate.

Appendix 21

Donahue McNamara Steel

Bloodborne Pathogens Exposure Control Plan

(Not Site Specific)

For Compliance with OSHA CFR 1910

Table of Contents

Donahue McNamara Steel

Blood borne Pathogens Exposure Control Plan

Date of Preparation: _____

In accordance with the OSHA Blood borne Pathogens Standard, CFR 1910, the following exposure control plan has been developed:

A. PURPOSE

The purpose of this exposure control plan is to:

- Eliminate or minimize employee occupational exposure to blood or certain other body fluids;
- Comply with the OSHA Blood borne Pathogens Standard CFR 1910 or applicable state or industry standard.

B. EXPOSURE DETERMINATION

The company has performed an exposure determination concerning which employees may incur occupational exposure to blood or other potentially infectious materials. The exposure determination is made without regard to the use of personal protective equipment (i.e. employees are considered to be exposed even if they wear personal protective equipment). This exposure determination lists all job classifications in which all employees may be expected to incur such occupational exposure, regardless of frequency. Donahue McNamara Steel has determined the following job classifications are in this category:

- First aid providers
- Emergency response team members

Donahue McNamara Steel has also determined that there are job classifications in which some employees may have occupational exposure. Since not all the employees in these categories would be expected to incur exposure to blood or other potentially infectious materials, tasks or procedures that would cause these employees to have occupational exposure, they are listed in order to clearly understand which employees in these categories are considered to have occupational exposure. The job classifications and associated tasks for these categories are as follows:

Job Classification	Task/Procedure
Emergency Response Team	*First Aid Treatment*

C. IMPLEMENTATION SCHEDULE AND METHODOLOGY

1. Compliance Methods

Universal precautions will be observed by Donahue McNamara Steel in order to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious material will be considered infectious regardless of the perceived status of the source individual.

Engineering and work practice controls will be utilized to eliminate or minimize exposure all Donahue McNamara Steel employees. Where occupational exposure remains after institution of these controls, personal protective equipment will also be utilized. Donahue McNamara Steel will utilize the following engineering controls will be utilized:

- ***No engineering controls are necessary as far as we know. Soap and hot water will be provided in restrooms, and employees shall be required to wash hands after removal of protective equipment.***

The above controls will be examined and maintained on a regular schedule to ensure the effectiveness of the controls. This will occur as follows:

- ***When any exposure occurs, or potential exposure occurs, and annually.***

Scheduled use of the Hand washing facilities will be made available to the employees who incur exposure to blood or other potentially infectious materials. These facilities are readily available and should be used immediately after incurring exposure. If hand washing facilities are not feasible, we will provide either an antiseptic cleanser in conjunction with clean cloth/paper towels or antiseptic towelettes. If these alternatives are used then hands are to be washed with soap and running water as soon as feasible.

Donahue McNamara Steel Foreman will ensure that after the removal of personal protective gloves, employees will wash hands and any other potentially contaminated skin area immediately or as soon as feasible with soap and water.

Donahue McNamara Steel Foreman will ensure that if employees incur exposure to their skin or mucous membranes then those areas will be washed or flushed with water as soon as feasible following contact.

2. **Work Area Restrictions**
   In work areas where there is a reasonable likelihood of exposure to blood or other potentially infectious materials, employees are not to eat, drink, apply cosmetics or lip balm, smoke, or handle contact lenses. Food and beverages are not to be kept in refrigerators, freezers, shelves, cabinets, or on counter tops or bench tops where blood or other potentially infectious materials are present. The company is not aware of any areas where infectious materials are present at this time, but Donahue McNamara Steel may designate an area if it becomes necessary after an injury.

3. **Contaminated Equipment**
   Donahue McNamara Steel Foreman are responsible for ensuring that equipment that has become contaminated with blood or other potentially infectious materials will be examined prior to servicing or shipping and will be decontaminated as necessary.

4. **Personal Protective Equipment**
   - **PPE Provision**
     The Donahue McNamara Steel Safety Director is responsible for ensuring that the following provisions are met.

     All personal protective equipment used by Donahue McNamara Steel will be provided without cost to employees. Personal protective equipment will be chosen

based on the anticipated exposure to blood or other potentially infectious materials. The protective equipment will be considered appropriate only if it does not permit blood or other potentially infectious materials to pass through or reach the employees' clothing, skin, eyes, mouth, or other mucous membranes under the normal conditions of use and for the duration of time which the protective equipment will be used.

- **PPE Use:**
  The Donahue McNamara Steel Foreman will ensure that the employee uses appropriate PPE unless the Foreman provides documentation that employee temporarily and briefly declined to use PPE when under rare and extraordinary circumstances it was the employee's professional judgment that in the specific instance its use would have prevented the delivery of healthcare or posed an increased hazard to the safety of the worker or co-worker. When the employee makes this judgment, the circumstances will be investigated and documented in order to determine whether changes can be instituted to prevent such occurrences in the future.

- **PPE Accessibility:**
  The Donahue McNamara Steel' Safety Director will ensure that appropriate PPE, in the appropriate sizes, is readily accessible at the work site or is issued without cost to employees. Hypo-allergenic gloves, glove liners, powder-less gloves, or other similar alternatives will be readily accessible to those employees who are allergic to the gloves normally provided.

- **PPE Cleaning, Laundering and Disposal**
  All personal protective equipment will be cleaned, laundered and disposed of by the employer, at no cost to the employees. All repairs and replacements will be made by the employer, at no cost to employees.

  All garments that are contaminated by blood will be removed immediately or as soon as feasible. All PPE will be removed prior to leaving the work area.

  When PPE is removed, it will be replaced in an appropriately designated area or container for storage, washing, decontamination or disposal.

- **Gloves**
  Gloves will be worn where it is reasonably anticipated that employees will have hand contact with blood, other potentially infectious materials, non-intact skin, and mucous membranes; and when handling or touching contaminated items or surfaces. Disposable gloves used by Donahue McNamara Steel' employees are not to be washed or decontaminated for re-use and are to be replaced as soon as practical when they become contaminated or as soon as feasible if they are torn, punctured, or when their ability to function as a barrier is compromised.

- **Eye and Face Protection**
  Masks in combination with eye protection devices, such as goggles or glasses with solid side shield, are required to be worn whenever splashes, spray, splatter, or

droplets of blood or other potentially infectious materials may be generated, and eye, nose, or mouth contamination can reasonably be anticipated. Any employee administering CPR will use mouthpieces or a dam to prevent skin to skin contact.

5. **Housekeeping**
   This facility will be cleaned and decontaminated according to the following schedule:

   - ***Immediately after any known contamination with infectious materials.***

6. **Waste Disposal**
   Regulated waste will be placed in containers which are closeable, constructed to contain all contents and prevent leakage of fluids during handling, storage, transportation or shipping.

   The waste must be labeled or color coded and closed prior to removal to prevent spillage or protrusion of contents during handling, storage, transport, or shipping.

   Disposal of all regulated waste will be in accordance with applicable State regulations.

7. **Laundry Procedures**
   Laundry contaminated with blood or other potentially infectious materials will be handled as little as possible. Such laundry will be placed in appropriately marked (biohazard labeled, or color coded red bag) bags at the location where it was used. Such laundry will not be sorted or rinsed in the area of use.

   - Laundry at this facility will be cleaned at an appropriate facility.

8. **Hepatitis B Vaccine and Post-Exposure Evaluation and Follow-up**
   - **General**
     Donahue McNamara Steel will make available the Hepatitis B vaccine and vaccination series to all employees who have had an occupational exposure incident, and post exposure follow-up.

     The Donahue McNamara Steel' Safety Director will ensure that all medical evaluations and procedures including the Hepatitis B vaccine and vaccination series and post exposure follow-up, including prophylaxis are:
     1) Made available at no cost to the employee;
     2) Made available to the employee at a reasonable time and place;
     3) Performed by or under the supervision of a licensed physician or by or under the supervision of another licensed healthcare professional and
     4) Provided according to the recommendations of the US Public Health Service.

     All laboratory tests will be conducted by an accredited laboratory at no cost to the employee.

   - **Hepatitis B Vaccination**
     The Donahue McNamara Steel' Safety Director is in charge of the Hepatitis B vaccination program.
     Donahue McNamara Steel contracts with their designated doctor to provide this service)

Hepatitis B vaccination will be made available after the employee has a potential occupational exposure unless, the employee has previously received the complete Hepatitis B vaccination series, or antibody testing has revealed that the employee is immune, or the vaccine is contraindicate for medical reasons.

Participation in a pre-screening program will not be a prerequisite for receiving Hepatitis B vaccination.

If the employee initially declines Hepatitis B vaccination, but at a later date while still covered under the standard decides to accept the vaccination, the vaccination will then be made available.

All employees who decline the Hepatitis B vaccination offered will sign the OSHA required waiver indicating their refusal.

If a routine booster dose of Hepatitis B vaccine is recommended by the US Public Health Service at a future date, such booster doses will be made available.

- **Post Exposure Evaluation and Follow-up**
  All exposure incidents will be reported, investigated, and documented. When the employee incurs an exposure incident, it will be reported to Donahue McNamara Steel' Foreman.

  Following a report of an exposure incident, the exposed employee will immediately receive a confidential medical evaluation and follow-up, including at least the following elements:
  1) Documentation of the route of exposure, and the circumstances under which the exposure incident occurred.
  2) Identification and documentation of the source individual, unless it can be established that identification is not feasible or prohibited by State or Federal law.
  3) The source individual's blood will be tested as soon as feasible and after consent is obtained in order to determine HBV and HIV infectivity. If consent is not obtained, Donahue McNamara Steel will document that legally required consent cannot be obtained. When the source individual's consent is required by law, the source individual's blood, if available, will be tested and the results documented.
  4) When the source individual is already known to be infected with HBV or HIV, testing for the source individual's known HBV or HIV status need not be repeated.
  5) Results of the source individual's testing will be made available to the exposed employee, and the employee will be informed of applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

  Collection and testing of blood for HBV and HIV serological status will comply with the following:
  1) The exposed employee's blood will be collected as soon as feasible and tested after consent is obtained.

2) The employee will be offered the option of having their blood collected for testing of the employee's HIV/HBV serological status. The blood sample will be preserved for up to 90 days to allow the employee to decide if the blood should be tested for HIV serological status.

All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up. All post exposure follow-up will be performed by Donahue McNamara Steel' designated doctor.

- **Healthcare Professional's Written Opinion**
  The Donahue McNamara Steel Safety Director will obtain and provide the employee with a copy of the evaluating healthcare professional's written opinion within 15 days of the completion of the evaluation.

  The healthcare professional's written opinion for HBV vaccination will be limited to whether HBV vaccination is indicated for an employee, and if the employee has received such vaccination. The healthcare professional's written opinion for post exposure follow-up will be limited to the following information.
  1) A statement that the employee has been informed of the results of the evaluation; and
  2) A statement that the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment.

  Note: All other findings or diagnosis will remain confidential and will not be included in the written report.

9. Labels and Signs

Donahue McNamara Steel Foreman will ensure that biohazard labels will be affixed to containers of regulated waste, or other potentially infectious materials.

The universal biohazard symbol will be used. The label will be fluorescent orange or orange-red.

Red bags or containers may be substituted for labels. However, regulated wastes must be handled in accordance with the rules and regulations of the organization having jurisdiction.

10. Information and Training

Donahue McNamara Steel Safety Director will ensure that training is provided at the time of initial assignment to tasks where occupational exposure may occur, and that it will be repeated within twelve months of the previous training. Training will be tailored to the education and language level of the employee, and offered during the normal work shift. The training will be an interactive and cover the following.

1) A copy of the standard and an explanation of its contents;
2) A discussion of the epidemiology and symptoms of bloodborne diseases;
3) An explanation of the modes of transmission of bloodborne pathogens;
4) An explanation of the Donahue McNamara Steel Bloodborne Pathogen Exposure Control Plan (this program), and a method for obtaining a copy.

5) The recognition of tasks that may involve exposure.
6) An explanation of the use and limitations of methods to reduce exposure, for example engineering controls, work practices and personal protective equipment (PPE).
7) Information on the types, use, location, removal, handling, decontamination, and disposal of (PPE).
8) An explanation of the basis of selection of (PPE).
9) Information on the Hepatitis B vaccination, including efficacy, administration, benefits, and that it will be offered free of charge.
10) Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials.
11) An explanation of the procedures to follow if an exposure incident occurs, including the method of reporting and medical follow-up.
12) Information on the evaluation and follow-up required after an employee exposure incident.
13) An explanation of the signs, labels, and color coding systems.

The person conducting the training will be knowledgeable in the subject matter.

Employees who have received training on bloodborne pathogens in the twelve months preceding the effective date of this policy will only receive training in provisions of the policy that were not covered.

Additional training will be provided to employees when there are any changes of tasks or procedures affecting the employee's occupational exposure.

11. Recordkeeping

- **Medical Records**

The Donahue McNamara Steel Safety Director is responsible for maintaining medical records as indicated below. These records will be kept at The Donahue McNamara Steel Office located in Meridian, Idaho.

Medical records will be maintained in accordance with OSHA Section 5193. These records will be kept confidential, and must be maintained for at least the duration of employment plus 30 years. The records will include the following:

1) The name and social security number of the employee.
2) A copy of the employee's HBV vaccination status, including the dates of vaccination.
3) A copy of all results of examinations, medical testing, and follow-up procedures.
4) A copy of the information provided to the healthcare professional, including a description of the employee's duties as they relate to the exposure incident, and documentation of the routes of exposure and circumstances of the exposure.

- **Training Records**

Donahue McNamara Steel Foreman are responsible for maintaining the following training records which shall be kept the personnel office. Training records will be kept at Donahue McNamara Steel's Corporate Office.

Training records will be maintained for 3 years from the date of the training. The following information will be documented:

1) The dates of the training sessions;
2) An outline describing the material presented;
3) The names and qualifications of persons conducting the training;
4) The names and job titles of all persons attending the training sessions.

- **Availability**

All employee records will be made available to the employee in accordance with OSHA Section 5193.

All employee records will be made available to the Assistant Secretary of Labor for the Occupational Safety and Health Administration and the Director of the National Institute for Occupational Safety and-Health upon request.

- **Transfer of Records**

If this facility is closed or there is no successor employer to receive and retain the records for the prescribed period, the Director of the NIOSH will be contacted for final disposition.

12. Evaluation and Review

The Donahue McNamara Steel Safety Director is responsible for annually reviewing this program, its effectiveness, and for updating this program as needed.

13. Dates

All provisions required by this standard will be implemented by: The Donahue McNamara Steel Safety Director.

HEPATITIS B VACCINE DECLINATION STATEMENT

(MANDATORY)

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to myself. However, I declined hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Name: _____

Signature: _____

Date: _____

Donahue McNamara Steel

Blood borne Pathogen Incident Report

Date: _____ Time: _____

Project: _____

Specific location on project: _____

Name of injured employee: _____

Names of all persons rendering assistance: _____
_____
_____
_____
_____

Description of the incident: _____
_____
_____
_____

Describe exposures to blood or infectious material: _____
_____
_____

What protective equipment was being used by the exposed employees? _____
_____
_____

Action taken: _____
_____
_____
_____

_____ _____

Signature/Title Date

Send Copy to Corporate Office

Appendix 22

Donahue McNamara Steel

Confined Space Entry Program

STANDARD PRACTICE INSTRUCTION

SUBJECT: Permit Required Confined Space Entry Program (General Industry)

REGULATORY STATUTE: OSHA - 29 CFR 1910.146

BASIS: Over 1 1/2 million workers enter confined spaces on an annual basis. Serious injury or death in a confined space can be the result of asphyxiation, engulfment, electric shock, falls, and heat stress. The Occupational Safety and Health Administration (OSHA) estimates that 85 percent of these accidents can be prevented if proper safety precautions at job sites are initiated. This poses a serious problem for exposed workers and their employer. The OSHA Confined Space Standard establishes uniform requirements to ensure that the hazards of confined spaces in U.S. workplaces are evaluated, safety procedures implemented, and that the proper hazard information is transmitted to all affected workers.

RESPONSIBILITY: The on-site company Foreman is:

_____

_____

_____

The Foreman is responsible for all facets of this program and has full authority to make necessary decisions to ensure success of the program. The Foreman is the sole persons authorized to amend these instructions and are authorized to halt any operation of the company where there is danger of serious personal injury. In addition to the Foreman listed above, Donahue McNamara Steel corporate management will have the authority to halt any operation of the company where there is danger of serious personal injury.

Confined Space Entry Program

Table of Contents

1. Written Program

DMS will review and evaluate this standard practice instruction on an annual basis, or when changes occur to 29 CFR 1910.146 that require revision of this document, or when project operational changes occur that require a revision of this document. Additionally, DMS will review the permit-required confined space program, using the cancelled permits retained within one (1) year after each entry and revise the program as necessary to ensure that the employees participating in entry operations are protected from permit space hazards.

2. General Requirements

DMS will establish confined space operational procedures through the use of this document.

A. Project Evaluation Criteria

Spaces that meet the following criteria will be designated as a permit required or non-permit required confined space:

- It is large enough and so configured that an employee can bodily enter and perform assigned work.
- Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.)
- Is not designed for continuous employee occupancy.
- Contains or has a potential to contain a hazardous atmosphere.
- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross-section.
- Contains any other recognized serious safety or health hazard.

B. Confined Space Identification

- Permit-required confined spaces. Those spaces meeting the criteria detailed in this section and having a known potential to contain hazardous atmospheres will be designated as permit-required confined spaces. All spaces will be considered permit-required confined spaces until the pre-entry procedures demonstrate otherwise. DMS will inform exposed employees, by posting danger signs, conducting awareness training, and/or by any other equally effective means, of the existence and location of, and the danger posed by the permit confined spaces. A sign reading:

"DANGER PERMIT REQUIRED CONFINED SPACE DO NOT ENTER",

or similar language will be used to satisfy the requirement for a sign.

- Non-permit confined spaces. Those spaces meeting the criteria detailed in this section that does not have a known potential to contain a hazardous atmosphere will be designated as non-permit confined spaces.

C. Confined Space Listing

Donahue McNamara Steel, once having evaluated its project(s) will maintain a detailed listing that identifies locations meeting the criteria for a confined space.

D. If Donahue McNamara Steel makes the determination that only specific employees will enter permitted spaces, effective measures will be taken to prevent non-trained employees from entering the permit-required confined spaces.

E. Employees that are required to perform work in permit-required confined spaces: Donahue McNamara Steel will implement the permit-required confined space entry program as detailed within this instruction. This written program will be available for inspection by employees, their authorized representatives, and authorized government inspectors.

F. Non-permit required confined spaces will be designated where the atmosphere and safety conditions can be controlled. Confined spaces may be entered without the need for a written permit or attendant provided that:

1) The space is determined not to be a permit-required confined space.
2) The space can be maintained in a safe condition for entry by mechanical ventilation alone.

All spaces will be considered permit-required confined spaces until the pre-entry procedures demonstrate otherwise. Donahue McNamara Steel will ensure that any employee required or permitted to pre-check or enter a confined space will have successfully completed the training as required by this instruction. A written copy of operating and rescue procedures as required by this instruction will be at the work site for the duration of the job. A site specific Confined Space Pre-Entry Checklist must be completed by the lead worker before entry into a confined space. The list will verify completion of the items required to verify safe entry. This checklist will be kept at the job site for the duration of the job. If circumstances dictate an interruption in the work, the permit-required confined space must be re-evaluated and a new checklist must be completed. Assuming the conditions set forth in the paragraphs listed below can be met, the following elements of the permit required confined space program need not be complied with if: (see 2.7.1 - 2.7.3)

- Permit required confined space program
- Permit system.
- Entry-Permit.
- Duties of authorized entrants.
- Duties of attendants.
- Duties of entry super-visors.
- Rescue and emergency services.

1) It can be demonstrated that the only hazard posed by the permit space is an actual potentially hazardous atmosphere.
2) It can be demonstrated that continuous forced air ventilation alone is sufficient to maintain the space safe for entry.
3) Monitoring and inspection data supports the demonstrations required by paragraphs 2.7.1 and 2.7.2.

G. If an initial entry of the permit space is necessary to obtain monitoring and inspection data. Worst case will be assumed and the full provisions of permit-required confined space entry procedures will be implemented.

H. Entry can be performed by company personnel, once determinations and supporting data required by paragraphs 2.6.1, 2.6.2, and 2.6.3 are documented, and are made available to each employee who enters the permit space.

I. Reclassification of a permit space after all hazards within the space have been eliminated.

The following requirements apply to entry into permit-spaces that meet the conditions set forth in paragraphs 2.7.1, 2.7.2, and 2.7.3. No personnel will enter the confined space unless:

1) Conditions making it unsafe to remove an entrance cover are eliminated before the cover is removed.
2) The opening at entrance covers are guarded by a railing, temporary cover, or other temporary barrier that will prevent accidental fall-through and will protect each employee working in the space from foreign objects entering the space.
3) The internal atmosphere has been tested, with a calibrated direct-reading instrument, for the following conditions in the order given:
   - Oxygen content. (I 9.5% - 23.5%). OSHA Mandated
   - Flammable gases and vapors. OSHA Mandated
   - Potential toxic air contaminants. OSHA Mandated
   - Airborne combustible dusts. Site Specific
   - Dilsocyanates. Site Specific
   - Lead and other heavy metals. Site Specific
   - _____ Site Specific
   - _____ Site Specific

J. There may be no hazardous atmosphere within the space whenever any employee is inside the space.

K. Continuous forced air ventilation will be used, as follows:

1) No employee may enter the space until testing confirms that the forced air ventilation has eliminated any hazardous atmosphere.
2) The forced air ventilation will be so directed as to ventilate the immediate areas where an employee is or will be present within the space and will continue until all employees have left the space.
3) The air supply for the forced air ventilation will be from a clean source and may not trap or restrict egress of entrants.
4) The atmosphere within the space will be continuously monitored when employees are working in the space to ensure no atmospheric hazards exist.
5) If a hazardous atmosphere is detected during entry:
   - All employees will evacuate.
   - The space will be evaluated to determine how the hazardous atmosphere developed.

- Measures will be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.

L. Permit Required Confined Space Certification.
Donahue McNamara Steel will verify that the space is safe for entry and that the measures required by a written certification permit meeting the criteria in 29 CFR 1910.146 are accomplished. This written certification will contain as a minimum; the date, the location of the space, and the signature of the person providing the certification. The certification will be made before entry and will be made available to each employee entering the space.

1) The following personnel are qualified to certify safe entry for company personnel entering confined spaces:

Name	Title

M. Non-Permit Required Confined Space Certification.
When there are changes in the use or configuration of a non-permit confined space that might increase the hazards to entrants, Donahue McNamara Steel will reevaluate that space and, if necessary, reclassify it as a permit-required confined space.

N. Permit to Non-Permit Reclassification.
A space classified by Donahue McNamara Steel as a permit-required confined space will be reclassified as a non-permit confined space under the following conditions:

1) If the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated without entry into the space, the permit space may be reclassified as a non-permit confined space for as long as the non-atmospheric hazards remain eliminated.
2) If it is necessary to enter the permit space to eliminate hazards, the entry will be performed with the assumption that a hazard exists. If testing and inspection during that entry demonstrate that the hazards within the permit space have been eliminated, the permit space may be reclassified as a non-permit confined space for as long as the hazards remain eliminated.
3) Note: Control of atmospheric hazards through forced air ventilation alone does not constitute elimination of the hazards. Continuous monitoring will be conducted to ensure forced air ventilation maintains a safe worker environment for reclassification to a non-permit-confined space.
4) Donahue McNamara Steel will document the basis for determining that all hazards in a permit space have been eliminated, through a certification that contains as a minimum; the date, the location of the space, and the signature of the person making the determination. The certification will be made available to each employee entering the space.
5) If hazards arise within a permit space that has been declassified to a non-permit space, each employee in the space will immediately exit the space and notify their supervisor. Donahue McNamara Steel will then reevaluate the

space and determine whether it must be reclassified as a permit space, in accordance with other applicable provisions of this instruction.

O. Company Responsibilities Regarding Sub-contractor Operations in Permitted Confined Spaces.
When Donahue McNamara Steel arranges to have employees of another employer (sub-contractor) perform work that involves permit space entry, Donahue McNamara Steel will:
    1) Inform the sub-contractor that the project contains permit spaces and that permit space entry is allowed only through compliance with the company permit space program.
    2) Inform the sub-contractor of the elements, including the hazards identified and Donahue McNamara Steel' experiences with the space, that make the space in question a permit space.
    3) Inform the sub-contractor of any precautions or procedures that Donahue McNamara Steel has implemented for the protection of employees in or near permit spaces where sub-contractor personnel will be working.
    4) Coordinate entry operations with the sub-contractor, when both Donahue McNamara Steel personnel and sub-contractor personnel will be working in or near permit spaces.
    5) Debrief the sub-contractor at the conclusion of the entry operation regarding the company permit space program, and any hazards confronted or created in the permit spaces during entry operations.

P. Sub-contractor Responsibilities Regarding Sub-contractor Operations in Permitted Confined Spaces.
In addition to complying with the permit space requirements that apply to all employees of Donahue McNamara Steel, each sub-contractor who is retained to perform permit space entry operations will:
    1) Obtain any available information regarding permit space hazards and entry operations from Donahue McNamara Steel.
    2) Coordinate entry operations with Donahue McNamara Steel, when both company personnel and sub-contractor personnel will be working in or near permit spaces.
    3) Inform any sub-contractors that they shall follow the Donahue McNamara Steel Confined Space Permit Program and that they shall inform Donahue McNamara Steel of any hazards confronted or created in permit spaces within this project or others belonging to Donahue McNamara Steel, either through a debriefing or during the entry operation.

3. Permit-Required Confined Space Program

Under the permit-required confined space program required by 29 CFR 1910.146, Donahue McNamara Steel will:

A. Implement the measures necessary to prevent unauthorized entry.
B. Identify and evaluate the hazards of permit spaces before employees enter them.

C. Develop and implement the means, procedures, and practices necessary for safe permit-space entry operations, including, but not limited to, the following:
    1) Specifying acceptable entry conditions.
    2) Isolating the permit space.
    3) Purging, inerting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards.
    4) Provide pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards.
    5) Verify that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry.
    6) Develop and utilize checklists based on this standard practice instruction and 29 CFR 1910.146.

D. Provide the following equipment at no cost to employees, maintain that equipment properly, and ensure that employees are training in the proper use of the equipment:
    1) Testing and monitoring equipment needed to determine if hazardous conditions exist or to verify that they do not exist.
    2) Ventilating equipment needed to obtain acceptable air quality entry conditions.
    3) Communications equipment necessary for communication between personnel involved in the entry operation.
    4) Personal protective equipment.
    5) Lighting equipment needed to enable employees to see well enough to work safely and to exit the space quickly in an emergency.
    6) Barriers and shields as required to protect workers from pedestrian and vehicular traffic.
    7) Ladders needed for safe access and egress by authorized entrants.
    8) Rescue, Retrieval, and Emergency equipment needed to extract or treat injured personnel, except to the extent that the equipment and or service are provided by rescue services that are immediately available.
    9) Any other equipment necessary for safe entry into and rescue from permitted spaces at a project.
    10) Principal equipment needed to conduct confined space operations. The below listed safe equipment at a minimum will be maintained where required for confined space operations.
        - Multi-gas monitor.
        - Ventilation Equipment.
        - Rescue tripod and winch system.
        - Body harnesses.
        - Retraction cable and lanyards.
        - Air Compressors (as required).
        - Supplied Air respirators (as required).
        - Air purifying respirators (as required).
        - SCBA equipment (as required).

- Emergency escape breathing app. (as required).
- Radio communication system (as required).
- Signage (as required).
- Lock-out/Tag-out Equipment (as required).
- Lighting equipment.
- Personal protective clothing.
- Hearing protection.
- Head protection.
- Eye Protection.
- First Aid kits.
- Time keeping equipment.
- Hand tools.
- Escape ladders for depths of four feet or shoulder height.

E. Evaluation of Permitted-Space Conditions.

1) Donahue McNamara Steel will evaluate permit space conditions as follows when entry operations are conducted:
2) Test conditions in the permit space to determine if acceptable entry conditions exist before entry is authorized to, except that, if isolation of the space is infeasible because the space is large or is part of a continuous system (such as a sewer). Pre-entry testing will be performed to the extent feasible before entry is authorized and, if entry is authorized, entry conditions will be continuously monitored in the areas where authorized entrants are working.
3) Test or monitor the permit space as necessary to determine if acceptable entry conditions are being maintained during the course of entry operations.
4) When testing for atmospheric hazards, use the following protocol; first for oxygen, then for combustible gases and vapors, and then for toxic gases and vapors.

Note: Atmospheric testing conducted in accordance with the "procedures for atmospheric testing" section of this instruction or Appendix B to 29 CFR 1910.146 will be used to satisfy this requirement. This appendix can also be used to develop procedures for permit space operations in sewers and other job sites, when supplemented by Appendix C (Examples) to 29 CFR 1910.146.

5) If multiple spaces are monitored by a single attendant, the permit will be annotated to provide the means and procedures by that the attendant is to respond to an emergency affecting one or more of the permit spaces being monitored.
6) When a confined space entry is to take place, Donahue McNamara Steel as part of the preplanning process, will designate in advance the persons who are to have active roles in the entry operation. Additionally the duties of each such employee will be identified, and that employee will be provided with the training required by the training section of this instruction. The confined space entry team will include but is not limited to the following:

- Authorized entrants.
- Attendants.
- Entry supervisors.
- Atmospheric monitoring personnel.
- Certifying personnel.
- Rescue/Emergency services personnel.

7) Donahue McNamara Steel will develop procedures prior to the commencement of confined space operations for the following:
   - Summoning rescue and emergency services.
   - Rescuing entrants from permit spaces.
   - Providing necessary emergency services for rescue.
   - Preventing unauthorized personnel from attempting a rescue.
8) Development and implementation for the preparation, issuance, use, and cancellation of entry permits will be as follows:
9) When employees of Donahue McNamara Steel and sub-contractor personnel are working simultaneously as authorized entrants in a permit space, the certifying official of the permit (or pre-designated representative) will ensure that all parties concerned are aware of the accepted entry procedures for the specific operation. This will ensure entry operations are properly coordinated.
10) The certifying official of the permit (or pre-designated representative) will ensure that all parties concerned are aware of the accepted procedures necessary for concluding the entry after entry operations have been completed (such as closing off a permit space and canceling the permit).
11) Donahue McNamara Steel will immediately review and as necessary halt and revise entry operations when there is reason to believe that the measures taken under the permit space program may not protect employees. The focus will be directed at the correction of deficiencies found to exist before subsequent entries are authorized. Examples of circumstances requiring the review of the permit-required confined space program are as a minimum:
    - Any unauthorized entry of a permit space.
    - The detection of a permit space hazard not covered by the permit.
    - The detection of a condition prohibited by the permit.
    - The occurrence of an injury or near miss during entry.
    - A change in the use or configuration of a permit space.
    - Employee complaints about the effectiveness of the program.
12) Review of the permit-required confined space program, using the canceled permits retained will be accomplished within one (1) year after each entry and the program revised as necessary, to ensure that employees participating in entry operations are protected from permit space hazards.

Note: Single annual reviews covering all entries performed during a 12-month period will be accomplished. If no entry is performed during a 12-month period, no review is necessary.

4. Permit System

To comply with the permit-system required by 29 CFR 1910.146, Donahue McNamara Steel will document the completion of the following measures before entry is authorized:

- Specifying acceptable entry conditions.
- Isolating the permit space.
- Purging, inerting, flushing, or ventilating the permit space as necessary to eliminate or control atmospheric hazards.
- Provide pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards.
- Verify that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry.
- Develop and utilize checklists based on this standard practice instruction and 29 CFR 1910.146.
- Before entry begins, the entry supervisor identified on the permit will sign the entry-permit to authorize entry.
- The completed permit will be made available at the time of entry to all authorized entrants, by posting it at the entry or by any other equally effective means, so that the entrants can confirm that pre-entry preparations have been completed.
- The duration of the permit may not exceed the time required to complete the assign task or job identified on the permit.
- The entry supervisor will terminate entry and cancel the entry permit when:
- The entry operations covered by the entry permit have been complete
- A condition that is not allowed under the entry permit arises in or near a permit space.
- Donahue McNamara Steel will retain each canceled entry permit for at least one (1) year to facilitate the review of the permit-required confined space program. Any problems encounter during an entry operation will be noted on the permit so that appropriate revisions to the permit-space program can be made.

5. Entry Permit

Donahue McNamara Steel will develop or use a standardized entry permit form (see section II this document) that documents compliance with this section and authorizes entry to a permit space. As a minimum the permit in use will identify the following:

- The permit space to be entered.
- The purpose of the entry.
- The date and the authorized duration of the entry permit.
- The authorized entrants within the permit space, by name or by such other means (for example, through the use of rosters or tracking systems) as will enable the attendant to determine quickly and accurately, for the duration of the permit, that authorized entrants are inside the permit space. If a tracking system is used for certain entries this requirement may be met by inserting a reference on the entry permit as to the means used, such as a roster or tracking system, to keep track of the authorized entrants within the permit space.
- The personnel, by name, currently serving as attendants.
- The individual, by name, currently serving as entry supervisor, with a space for the signature or initials of the entry supervisor who originally authorized entry.

- The hazards of the permit space to be entered.
- The measures used to isolate the permit space and to eliminate or control permit space hazards before entry. Such as; the lockout or tagging of equipment and procedures for purging, inerting, ventilating, and flushing permit spaces.
- The acceptable entry conditions.
- The results of initial and periodic atmospheric tests performed, accompanied by the names or initials of the testers and by an indication of when the tests were performed.
- The rescue and emergency services that can be summoned and the means (such as the equipment to use and the numbers to call) for summoning those services.
- The communication procedures used by authorized entrants and attendants to maintain contact during the entry.
- Equipment, such as personal protective equipment, testing equipment, communications equipment, alarm systems, and rescue equipment, to be provided for compliance with the permit requirement.
- Any other information whose inclusion is necessary, given the circumstances of the particular confined space to ensure employee safety.
- Any additional permits, such as for hot work that has been issued to authorize work in the permit space.
- Donahue McNamara Steel will provide training so that all employees whose work is regulated by this section acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned under this section.

Donahue McNamara Steel will develop a standardized training format to meet the requirements for confined space entry. Training will be provided to each affected employee:

- Before the employee is first assigned duties that require a confined space.
- Before there is a change in assigned duties.
- Whenever there is a change in permit space operations that presents a hazard about that an employee has not been previously trained.
- Whenever Donahue McNamara Steel has reason to believe that there are deviations from permit space entry procedures required by this instruction or inadequacies in the employee's knowledge or use of these procedures.

The training will establish employee proficiency in the duties required by this instruction and will introduce new or revised procedures, as necessary, for compliance with this instruction or when future revisions occur.

Donahue McNamara Steel will certify that the training required by this section has been accomplished. The certification will contain each employee's name, the signatures or initials of the trainers, and the dates of training. The certification will be available for inspection by employees and their authorized representatives.

6. Duties of Authorized Entrants

- Donahue McNamara Steel will ensure that all authorized entrants:
- Know the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- Properly use equipment as required by paragraph 29 CFR 1910.146 (d)(4) of this section.

- Communicate with the attendant as necessary to enable the attendant to monitor entrant status and to enable the attendant to alert entrants of the need to evacuate the space as required by this section.
- Alert the attendant whenever:
- The entrant recognizes any warning sign or symptom of exposure to a dangerous situation.
- The entrant detects a prohibited condition.
- Exit from the permit space as quickly as possible whenever:
- An order to evacuate is given by the attendant or the entry supervisor.
- The entrant recognizes any warning sign /symptom of exposure to a dangerous situation.
- The entrant detects a prohibited condition.
- An evacuation alarm is activated.

7. Duties of Authorized Attendants

Donahue McNamara Steel will ensure that each attendant:

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- Is aware of possible behavioral effects of hazard exposure in authorized entrants.
- Continuously maintains an accurate count of authorized entrants in the permit space and ensures that the means used to identify authorized entrants under this section accurately identifies who is in the permit space.
- Remains in a pre-designated location outside the permit space during entry operations until relieved by another attendants
- Communicates with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space.
- Monitors activities inside and outside the space to determine if it is safe for entrants to remain in the space and orders the authorized entrants to evacuate the permit space immediately under any of the following conditions:
- If the attendant detects a prohibited condition.
- If the attendant detects the behavioral effects of hazard exposure in an entrant.
- If the attendant detects a situation outside the space that could endanger the entrants.
- If the attendant cannot effectively/ safely perform all the duties required under this section.
- Summon rescue and other emergency services as soon as the attendant determines that entrants may need assistance to escape from permit space hazards.
- Takes the following actions when unauthorized personnel approach or enter a permit space while entry is underway
- Warn the unauthorized persons that they must stay away from the permit space.
- Advise the unauthorized persons that they must exit immediately if they have entered the permit space.
- Inform the authorized entrants and the entry supervisor if unauthorized persons have entered the permit space.
- Performs non-entry rescues as specified by Donahue McNamara Steel' rescue procedure.
- Performs no duties that might interfere with the attendant's primary duty to monitor and protect the entrants.

8. Duties of Entry Supervisors

Donahue McNamara Steel will ensure that each entry supervisor:

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- Verifies, by checking that the appropriate entries have been made on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin.
- Terminates the entry and cancels the permit as required in accordance with the "permit section" of this instruction.
- Verifies that rescue services are available and the means for summoning them are operable.
- Ensures removal of unauthorized individuals who enter or who attempt to enter the permit space during entry operations.
- Determines, whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.

9. Rescue and Emergency Services

The following requirements apply to company personnel who enter permit spaces to perform rescue services:

- Donahue McNamara Steel will ensure that each member of the rescue service is provided with, and is trained to use properly, the personal protective equipment and rescue equipment necessary for making rescues from permit spaces.
- Each member of the rescue service will be trained to perform the assigned rescue duties. Each member of the rescue service will also receive the training required of authorized entrants under the "duties of authorized entrants" section of this instruction.
- Each member of the rescue service will practice making permit space rescues at least once every 12 months, by means of simulated rescue operations in that they remove dummies, mannequins, or actual persons from the actual permit spaces or from representative permit spaces. Representative permit spaces will, with respect to opening size, configuration, and accessibility, simulate the types of permit spaces from that Donahue McNamara Steel anticipates rescue is to be performed.
- Each member of the rescue service will be trained in basic first aid and in cardiopulmonary resuscitation (CPR). At least one member of the rescue service holding current certification in first aid and in CPR will be available.

10. Non-Company Rescue Personnel

When non-company rescue personnel are designated to perform permit space rescue, DMS will:

- Inform the rescue service of the hazards they may confront when called on to perform rescue.

- Provide the rescue service with access to all permit spaces from that rescue may be necessary so that the rescue service can develop appropriate rescue plans and practice rescue operations.
- To facilitate non-entry rescue, retrieval systems or methods will be used whenever an entrant enters a permit space, unless the retrieval equipment would increase the overall risk of entry or would not contribute to the rescue of the entrant. Retrieval systems used by Donahue McNamara Steel will meet the following requirements:
- Each authorized entrant will use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, or above the entrant's head. Wristlets may be used in lieu of the chest or full body harness if it is demonstrated that the use of a chest or full body harness is infeasible or creates a greater hazard and that the use of wristlets is the safest and most effective alternative.
- The other end of the retrieval line will be attached to a mechanical device or fixed point outside the permit space in such a manner that rescue can begin as soon as the rescuer becomes aware that rescue is necessary. A mechanical device will be available to retrieve personnel from vertical type permit spaces more than 5 feet deep.
- If an injured entrant is exposed to a substance for that a Material Safety Data Sheet (MSDS) or similar written information is required to be kept at the project, that MSDS or written information will be made available to the medical project treating the exposed entrant.

11. Procedures for Atmospheric Testing

Atmospheric testing for confined space entry is required for two distinct purposes; evaluation of the hazards of the permit spaces and verification of acceptable entry conditions exists for that space.

Evaluation Testing

Donahue McNamara Steel will ensure that the atmosphere of a confined space is analyzed using equipment of sufficient sensitivity and specificity to identify and evaluate any hazardous atmospheres that may exist or arise. This is required to ensure that appropriate permit entry procedures specific to the operation can be developed and acceptable entry conditions stipulated for that specific space. Evaluation and interpretation of these data, and development of the entry procedure, will be done by, or reviewed by, a technically qualified professional (e.g., First Link Safety Services, OSHA consultation service, or certified industrial hygienist, etc.) based on evaluation of all serious hazards.

The internal atmosphere will be tested, with a calibrated direct-reading instrument, for the following conditions in the order given:

Oxygen content. (19.5% - 23.5%).	OSHA Mandated
Flammable gases and vapors.	OSHA Mandated
Potential toxic air contaminants.	OSHA Mandated
Airborne combustible dusts.	Site Specific
Dilsocyanates.	Site Specific

Lead and other heavy metals.	Site Specific
_____	Site Specific

Verification Testing

The atmosphere of a permit space that may contain a hazardous atmosphere will be tested for residues of all contaminants identified by evaluation testing using permit specified equipment to determine that residual concentrations at the time of testing and entry are within the range of acceptable entry conditions. Results of testing (i.e., actual concentration, etc.) will be recorded on the permit in the space provided adjacent to the stipulated acceptable entry condition.

The atmosphere will be verified, with a calibrated direct-reading instrument, for the following conditions in the order given:

Oxygen content. (19.5% - 23.5%).	OSHA Mandated
Flammable gases and vapors.	OSHA Mandated
Potential toxic air contaminants.	OSHA Mandated
Airborne combustible dusts.	Site Specific
Dilsocyanates.	Site Specific
Lead and other heavy metals.	Site Specific
_____	Site Specific
_____	Site Specific

Duration of Testing

Measurement of values for each atmospheric parameter will be made for at least the minimum response time of the test instrument specified by the manufacturer.

Testing Stratified Atmospheres

When monitoring for entries involving a descent into atmospheres that may be stratified, the atmospheric envelope will be tested a distance of approximately 4 feet (1.22 in) in the direction of travel and to each side. If a sampling probe is used, the entrant's rate of progress will be slowed to accommodate the sampling speed and detector response.

The stratified atmosphere will be tested, with a calibrated direct-reading instrument, for the following conditions in the order given:

Oxygen content. (19.5% - 23.5%)	OSHA Mandated
Flammable gases and vapors	OSHA Mandated
Potential toxic air contaminants	OSHA Mandated
Airborne combustible dusts.	Site Specific
Dilsocyanates.	Site Specific
Lead and other heavy metals.	Site Specific
_____	Site Specific

Donahue McNamara Steel

Confined Space Entry Permit

Project: _____ Permit #: _____
Permit Validity Period: (day/time) _____ to _____
Confined Space Identification Code (if identified): _____
Notes: _____
_____

Authorized Personnel:
Workers Authorized Entry Attendants Fire watch (hot work) _____
_____
_____
_____
_____
_____

Known Hazards (indicate specific hazards with initials)

____ Oxygen deficiency (less than 19.5%).
____ Oxygen enrichment (more than 23.5%).
____ Flammable gases or vapors (more than 10% of PEL).
____ Airborne combustible dust (meets or exceeds PEL).
____ Toxic gases or vapors (more than PEL).
____ Mechanical hazards.
____ Electrical hazards.
____ Engulfment hazards.
____ Materials harmful to skin.
____ Other:
____ Other:
____ Other:
____ Other:

Employee Training and Pre-Entry a Briefing

Safe Entry and Rescue Training Conducted on? _____
Mandatory Pre-Entry Briefing Conducted on? _____
Does this job require any special training? Yes: _____ No:_____

If yes, type of training required: _____
_____
_____

Contractor Notification

Contractor Notified of: Permit Conditions: Yes: _____ No:_____
Potential Hazards: Yes: _____ No: _____

Communication Requirements: Intrinsically Safe? Yes: _____ No: _____
Visually Inspected? Yes: _____ No: _____
_____
_____
_____
_____

Lighting Requirements: Intrinsically Safe? Yes: _____ No: _____
Visually Inspected? Yes: _____ No: _____
_____
_____
_____
_____

Special Tools/Equipment: Intrinsically Safe? Yes: _____ No: _____
Visually Inspected? Yes: _____ No: _____

Site Preparation:

Work area isolated with signs and or barriers? Yes: _____ No: _____
All energy sources locked/tagged out? Yes: _____ No: _____
All input lines capped/blinded? Yes: _____ No: _____
Is vessel, drained, flushed, neutralized? Yes: _____ No: _____
Is vessel, cleaned, purged? Yes: _____ No: _____
Ventilation initiated 30 min. before entry? Yes: _____ No: _____
Fire extinguishers on hand? Yes: _____ No: _____
_____ Yes: _____ No: _____
_____ Yes: _____ No: _____
_____ Yes: _____ No: _____

Pre-Entry Atmospheric Testing:

Action Requirement	Reading	Time	Intervals	Levels
Test for oxygen content:	_____ % O2	_____	_____	_____
Test for flammable content:	_____ <10% LEL	_____	_____	_____
Test for H2S:	_____ < 10 PPM	_____	_____	_____
Test for Cl2:	_____ <.5 PPM	_____	_____	_____
Test for CO:	_____ < 35 PPM	_____	_____	_____
Test for SO2:	_____ < 2 PPM	_____	_____	_____
Test for toxic content:	_____ PPM	_____	_____	_____
(TLV=_____):	_____ of _____			

Test for heat stress: _____ of _____

Test for: _____

Tester: Name: _____Signature: _____

Title: _____ Date: _____ Time: _____

Emergency/Rescue Procedures

Location of Written Emergency/Rescue Plan: _____

Type of Emergency/Rescue Team required: _____

On-site: Yes: ___ No: ___

Contact: _____ Phone: _____

Off-site: Yes: ___ No: ___

Contact: _____ Phone: _____

Additional Information:

_____

_____

_____

_____

Safety Equipment

Personal Protective Equipment Required

_____

_____

_____

_____

Air purifying respirator?
Type: _____ Yes: _____ No: _____

Self-contained Breathing Apparatus Required? Yes: _____ No: _____
Atmospheric Monitor Required? Type: Yes: _____ No: _____

Area Safely Equipment Required

_____
_____
_____
_____
_____

Permit Authorization

I certify that I have inspected the work area for safety and reviewed all safety precautions recorded on this permit.
Name: _____ Signature: _____
Title: _____ Date: _____ Time: _____

Name: _____ Signature: _____
Title: _____ Date: _____ Time: _____

Appendix 23.1

Donahue McNamara Steel

Excavation Checklist

1. Have the Supervisors and Workers been trained in excavation safety laws and procedures per OSHA 1926, Subpart - P?

2. Have underground utilities been located?

3. Have buildings, utility poles, trees or any other objects or destabilizing forces been taken into consideration?

4. Has soil type been determined?

5. Has the appropriate means of sloping or shoring the excavation by OSHA 1926, Subpart P, required been determined?

6. Are ladders, steps or ramps in excavations over four feet deep provided where a worker will not have to travel laterally more than 25 feet to reach them?

7. Do ladders extend three feet above the surface and are they secured?

8. Has spoil pile been placed at least two feet back from the edge of the excavation?

9. Has confined space atmospheric hazards been considered plus training?

10. Have undermined structure (i.e. sidewalks, buildings, streets) been shored, cribbed or approved by a registered engineer?

11. Do bridges and walkways have standard guard rails?

12. Are utilities crossing the excavation supported from above?

13. Have means been afforded to divert or remove water from the excavation?

14. Are open pits or shafts covered or barricaded?

15. Are inspections made by a competent person daily or more frequently as conditions require (i.e., after rain, presence of ground water)?

16. When the job is completed, is the shoring or shielding removed in a manner which insures the safety of workers?

Copy to Corporate Office

Appendix 23.2

Donahue McNamara Steel

DAILY EXCAVATION / TRENCHING INSPECTION REPORT

Date/Time/Job

Depth

Soil Type

Slope Ratio

Shoring OK

Shielding OK

Barricades

Water Removal

Traffic Control

Atmosphere

Spoil Pile

Comments

Competent Person Signature Title

Copy to Corporate Office

Appendix 24

Donahue McNamara Steel

Safety Training Attendance Form

The undersigned individuals have received training concerning the subject matter described below. Their signature indicates that they clearly understand the conditions, requirements, rights, and responsibilities that are associated with the subject matter and related policies, programs, and standards as may be applicable.

Subject of Training Session: _____

Date: _____

TRAINER

_____ _____

Printed Name *Signature*

ATTENDEES

Printed Name *Signature*

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____
11. _____
12. _____

APPENDIX 25

Donahue McNamara Steel

Safety Committee

A. **Purpose:** To assist in the detection and elimination of unsafe conditions and work procedures. A safety and health committee will be established with representation from employees and management.

B. **Procedure:** The following guidelines will be followed:

1. Committee members will be selected by Donahue McNamara Steel management to represent employee safety concerns.
2. Safety committee members will be rotated at least annually. Should a vacancy occur on the committee, a new member will be selected by corporate management.
3. The meetings will be held monthly at the Donahue McNamara Steel corporate office.
4. The date and hour of meetings will be determined by the Donahue McNamara Steel corporate management.
5. The length of each meeting will be approximately one hour.
6. The attendance and subjects discussed will be documented and maintained on file for a period of three years. Written information and directives will be distributed to Project Foreman, and Project Managers. Information is to be relayed to employees will be addressed in the weekly project safety meeting and will be posted on the safety bulletin board.
7. The Project Managers and Foreman are responsible for auditing individual projects for compliance with new directives.

C. **Scope of Activities:**

1. Conduct in-house safety inspections with supervisor involved.
2. Implement & ensure training for fire & evacuation procedures.
3. Assist in accident investigation to uncover trends.
4. Review accident reports to determine means or elimination.

5. Assist in implementation of hazardous materials communications.
6. Accept and evaluate employee suggestions.
7. Review job procedures and recommend improvements.
8. Monitor the safety program effectiveness.
9. Promote and publicize safety.

D. **Documentation:** All Safety Committee activities will be documented and available for review by employees and regulatory agencies.

E. **Implementation:** Members of the Safety Committee will, prior to the regularly scheduled committee meeting, assist the appropriate supervisors in conducting self-inspections of their respective work areas to determine what hazardous conditions and/or practices exist. An inspection checklist should be utilized. Other sources that can be consulted or utilized in conducting inspections include:

1. General Safety and Health Standards.
2. Employee suggestions.
3. Previous accident experience of this company.
4. **First Link Safety.**

Findings of the self-inspection will be reviewed and discussed at the next scheduled Safety Committee meeting. Unresolved problems resulting from this inspection will be forwarded through the Safety Committee organizational process.

F. **Follow up:** The over-site of the recommendations by the committee may be accomplished by one of the following options:

1. Carrying out the recommendations.
2. Explaining why no action can be taken.
3. Proposing an alternative.

APPENDIX 26

Donahue McNamara Steel

Critical Lift Plan and Pre-engineered Lift Procedure

A Critical Lift Plan and a Pre-engineered Lift Procedure consist(s) of as many drawings, specifications, and procedures as necessary to accurately assess all important load factors and site factors relating to a Critical Lift. These items are included as a guide, but should not be interpreted as being all-inclusive in the analysis and preparation of a Critical or Pre-engineered Lift. Sound engineering and planning is still the responsibility of the cognizant engineer and/or project manager associated with the lift. The exhibit Checklist for Lift Planning summarizes those factors. Most lifts, however, even some Critical Lifts, do not involve all of the factors listed there.
The lift plan for a Pre-engineered Lift must be a Department/Division procedure, subject to the review, approval, and record management policies of the Department/Division. This includes the signed reading acknowledgement for individuals performing the actions of the procedure, specifically the Person-in-charge (PIC) of the lift and the crane operator. The elements required for a Critical Lift Plan also are required for a Pre-engineered Lift Procedure (lift plan).
The following is the minimum level of information required for completing an adequate lift plan:

Elevation View Drawing of the crane, load, and any nearby structures, which could cause interference.
This drawing must be made to scale and should note

- Crane manufacturer(s), model(s), and counterweight(s) if variable.
- Boom length(s) and lifting radius(i).
- Maximum load elevation during lifting procedure.
- Any jibs or special lifting devices required.
- Minimum number of parts of crane hoist line required for lifting the load.
- All required slings, shackles, and other rigging components identified by capacity, size, length, and location.
- Calculated center of gravity of load.

Plan View Drawing of the crane, load, and nearby structures, which could cause interference. This drawing must be made to scale and should note

- Route that transport will take to position the load for lifting.
- Initial lifting position of the load including radius. Lifting radius must be accurately determined.
- Final placement position of the load including radius. Lifting radius must be accurately determined. Location of the crane(s) including tail swing limits.
- Route that crane(s) will take if walking with the load, as well as associated matting requirements.
- Any utilities located within the work zone. Underground facilities – piping, ducts, etc. – must be accurately located.
- Space may be needed to assemble crane.

- Planning must include load transportation considerations, e.g., how to get the load close enough to the crane. This may be a function of the type of crane being used, for example some cranes perform better in certain sectors (quadrants) of operation than others.

Lift Analysis including

- Tabulation of the gross load weight, including the weight of all blocks and rigging tackle.
- Rigging attachment points and special rigging requirements.
- Gross rated capacity of the crane in the configuration specified.
- Calculation of the percentage of the crane's rated capacity at which the lift will be made.
- Crane-imposed soil loads must be determined. Soil analysis may be needed to verify crane-imposed loads can be safely supported.
- Allowable weather conditions for the lift and the effect of wind loading.
- Sequence of work, including lift-off, steady state conditions, and set-down of load (including positions where there is a shift in the location of the center of gravity, for the pick points).

All potential complicating issues for any lifts must be addressed in the lift plan. However, for a relatively simple operation the above items can provide sufficient information and even be organized onto one drawing.

Critical Lift Plan and Pre-engineered Lift Procedure

A Critical Lift Plan and a Pre-engineered Lift Procedure consist(s) of as many drawings, specifications, and procedures as necessary to accurately assess all important load factors and site factors relating to a Critical Lift. These items are included as a guide, but should not be interpreted as being all-inclusive in the analysis and preparation of a Critical or Pre-engineered Lift. Sound engineering and planning is still the responsibility of the cognizant engineer and/or project manager associated with the lift. The exhibit Checklist for Lift Planning summarizes those factors. Most lifts, however, even some Critical Lifts, do not involve all of the factors listed there.
The lift plan for a Pre-engineered Lift must be a Department/Division procedure, subject to the review, approval, and record management policies of the Department/Division. This includes the signed reading acknowledgement for individuals performing the actions of the procedure, specifically the Person-in-charge (PIC) of the lift and the crane operator. The elements required for a Critical Lift Plan also are required for a Pre-engineered Lift Procedure (lift plan).
The following is the minimum level of information required for completing an adequate lift plan:

Elevation View Drawing of the crane, load, and any nearby structures, which could cause interference.
This drawing must be made to scale and should note

- Crane manufacturer(s), model(s), and counterweight(s) if variable.
- Boom length(s) and lifting radius(i).
- Maximum load elevation during lifting procedure.
- Any jibs or special lifting devices required.
- Minimum number of parts of crane hoist line required for lifting the load.
- All required slings, shackles, and other rigging components identified by capacity, size, length, and location.
- Calculated center of gravity of load.

Plan View Drawing of the crane, load, and nearby structures, which could cause interference. This drawing must be made to scale and should note

- Route that transport will take to position the load for lifting.
- Initial lifting position of the load including radius. Lifting radius must be accurately determined.
- Final placement position of the load including radius. Lifting radius must be accurately determined. Location of the crane(s) including tail swing limits.
- Route that crane(s) will take if walking with the load, as well as associated matting requirements.
- Any utilities located within the work zone. Underground facilities – piping, ducts, etc. – must be accurately located.
- Space may be needed to assemble crane.
- Planning must include load transportation considerations, e.g., how to get the load close enough to the crane. This may be a function of the type of crane being used, for example some cranes perform better in certain sectors (quadrants) of operation than others.

Lift Analysis including

- Tabulation of the gross load weight, including the weight of all blocks and rigging tackle.
- Rigging attachment points and special rigging requirements.
- Gross rated capacity of the crane in the configuration specified.
- Calculation of the percentage of the crane's rated capacity at which the lift will be made.
- Crane-imposed soil loads must be determined. Soil analysis may be needed to verify crane-imposed loads can be safely supported.
- Allowable weather conditions for the lift and the effect of wind loading.
- Sequence of work, including lift-off, steady state conditions, and set-down of load (including positions where there is a shift in the location of the center of gravity, for the pick points).

All potential complicating issues for any lifts must be addressed in the lift plan. However, for a relatively simple operation the above items can provide sufficient information and even be organized onto one drawing.

APPENDIX 27 (Idaho)

Donahue McNamara Steel

Emergency Evacuation Plan

NOTICE

Emergency Evacuation Plan

READ THIS NOTICE

Jobsite Name: _____

Jobsite Address: _____

These are general emergency response procedures

1. Call 911 to summon local emergency units.
2. Alert fellow workers
3. Alert site foreman: _____
4. Evacuate the building in an orderly manner
5. Assemble in groups to a safe holding area
6. Remain in holding area until a head count is taken

Holding Area is at the Jobsite Trailer

REPORT ANY MISSING EMPLOYEE TO EMERGENCY PERSONNEL IMMEDIATELY

Employees are strictly forbidden to re-enter an evacuated building site until the all clear is given by emergency response personnel and an authorized supervisor.

In the Event of an Emergency please call 911

Safety Consultant – First Link Safety – 208-861-2708

Dig-line – 811

Idaho Power – 388-2323

Intermountain Gas – 1-877-777-7442

United Water – 362-1700

APPENDIX 27 (Utah)

Donahue McNamara Steel

Emergency Evacuation Plan

NOTICE

Emergency Evacuation Plan

READ THIS NOTICE

Jobsite Name: _____

Jobsite Address: _____

These are general emergency response procedures

1. Call 911 to summon local emergency units.
2. Alert fellow workers
3. Alert site foreman: _____
4. Evacuate the building in an orderly manner
5. Assemble in groups to a safe holding area
6. Remain in holding area until a head count is taken

Holding Area is at the Jobsite Trailer

REPORT ANY MISSING EMPLOYEE TO EMERGENCY PERSONNEL IMMEDIATELY

Employees are strictly forbidden to re-enter an evacuated building site until the all clear is given by emergency response personnel and an authorized supervisor.

In the Event of an Emergency please call 911

Safety Consultant – First Link Safety – 208-861-2708

Blue Stake – 1-800-662-7836

Pacific Power – 1-503-813-5235

Questar Gas – 1-800-341-9250

West Jordan Water & Sewer – 1-801-569-5020

APPENDIX 27 (Wyoming)

Donahue McNamara Steel

Emergency Evacuation Plan

NOTICE

Emergency Evacuation Plan

READ THIS NOTICE

Jobsite Name: _____

Jobsite Address: _____

These are general emergency response procedures

1. Call 911 to summon local emergency units.
2. Alert fellow workers
3. Alert site foreman: _____
4. Evacuate the building in an orderly manner
5. Assemble in groups to a safe holding area
6. Remain in holding area until a head count is taken

Holding Area is at the Jobsite Trailer

REPORT ANY MISSING EMPLOYEE TO EMERGENCY PERSONNEL IMMEDIATELY

Employees are strictly forbidden to re-enter an evacuated building site until the all clear is given by emergency response personnel and an authorized supervisor.

In the Event of an Emergency please call 911

Safety Consultant

First Link Safety – 208-861-2708

One Call – 1-800-849-2476

www.lowervalleyenergy.com

APPENDIX 27

Donahue McNamara Steel

Emergency Evacuation Plan

NOTICE

Emergency Evacuation Plan

READ THIS NOTICE

Jobsite Name: _____

Jobsite Address: _____

These are general emergency response procedures

1. Call 911 to summon local emergency units.
2. Alert fellow workers
3. Alert site foreman: _____
4. Evacuate the building in an orderly manner
5. Assemble in groups to a safe holding area
6. Remain in holding area until a head count is taken

Holding Area is at the Jobsite Trailer

REPORT ANY MISSING EMPLOYEE TO EMERGENCY PERSONNEL IMMEDIATELY

Employees are strictly forbidden to re-enter an evacuated building site until the all clear is given by emergency response personnel and an authorized supervisor.

In the Event of an Emergency please call 911

Safety Consultant – First Link Safety – 208-861-2708

Dig-line: _____

Power: _____

Gas: _____

Water & Sewer: _____