

EMPLOYEE HANDBOOK

Revised: March 2019

Alta Construction, Inc.

PO Box 1021 17 Smiths Fork Way Lyman, WY 82937 (307) 786-4834 (307) 786-2094 fax

August 01, 2008

Dear Employee,

Welcome to Alta Construction, Inc.

As an employee, you are part of a company which is committed to provide its customers with quality construction services on schedule, on budget, and at a reasonable cost. Alta Construction, Inc., as an employer, recognizes the importance of providing a working environment that is favorable to the company mission. This means the administration of personnel policies, as well as benefit and compensation programs, that are competitive, fair, and understandable. This handbook intends to communicate terms and conditions of employment that apply to each of us as we carry out our responsibilities at Alta Construction, Inc.

The employee handbook is designed to serve as an overview of the personnel rules to help you understand important rights, responsibilities, and benefits you have as an employee of Alta Construction, Inc. If you have questions regarding any of the policies, procedures, or benefits covered in this handbook, you are encouraged to contact your supervisor, or management.

I hope you will derive much satisfaction and personal fulfillment in knowing the vital contribution that you make to the success of this Company.

Sincerely,

Stuart J. Hickman President

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General Information

Alta Construction, Inc. P. O. Box 1021 Lyman, Wyoming 82937 (307) 786-4834

1. HANDBOOK INTRODUCTION

Alta Construction, Inc. is an equal opportunity employer. Alta Construction, Inc. does not discriminate on the basis of age, sex, marital status, color, race, religion, national origin, or disability.

The material contained in these policies is informational in nature. These policies replace and supersede all previous employment policy statements and practices.

While we expect you and Alta Construction, Inc., to be guided by the information described in these policies, no single document can cover every conceivable situation. Thus, Alta Construction, Inc. reserves the right to handle individual situations, in its sole discretion, in a manner that is appropriate to the particular situation. THESE POLICIES DO NOT GUARANTEE YOUR FUTURE EMPLOYMENT. YOUR EMPLOYMENT REMAINS "AT-WILL" AND TERMINABLE BY YOU, OR ALTA CONSTRUCTION, INC., AT ANY TIME, WITH OR WITHOUT CAUSE. The employment at-will relationship may be changed only by a written agreement signed by the President of the Company.

These Policies serve as an important employee guide, and you should treat it as such. These Policies are designed to answer many of your questions about working at Alta Construction, Inc. The policies are intended to be a quick reference guide to Alta Construction, Inc., employee policies. The information in the handbook is current as of the revised date, but is subject to change as statues and regulations are modified.

When you have questions about working at Alta Construction, Inc., these policies are a good place to start looking for answers. If you still have a question, talk with your supervisor.

2. ALTA FIELD WORK POLICIES

- A. All authorized work hours in excess of 40 hours during a workweek, Sunday through Saturday, will be compensated at one and one-half the regular pay rate.
- B. Employees are expected to have the necessary SKILLS and TOOLS required to perform the task for which they are hired. Please refer to the tool lists in attachment
- C. Lunch break will be 30 minutes per day. Lunches will be stored and eaten in designated areas. No smoke, coffee, or other breaks are scheduled.
- D. Scheduled tool pickup time at day's end will be 10 minutes prior to quitting time.
- E. All employees will be given Safety Orientation and are expected to read, sign, and abide by the Alta Safety Manual and other safety policies set up by the Safety Officer. Attendance at safety meetings is required by all employees. By signing this Jobsite Policy, the employee acknowledges that he or she has received, read and understands the Safety Regulations as set forth in the Alta Policy Manual, and agrees to abide by those regulations.
- F. An employee who is unable to report for work shall report the reason for the absence to their supervisor as soon as possible, but no later than 7:30 am of each workday. The employee may be required to provide proof to satisfy the supervisor that the absence is justified. The employee, at the discretion of their supervisor or management, may be required to provide proof of illness in the form of a written statement by a physician certifying that the employee's condition prevented the employee from appearing for work. Unexcused absence and excessive absence are prohibited and will not be tolerated.
- G. Paydays for Alta construction are bi-weekly with checks issued every other Friday, after 12:00 (noon).
- H. Work hours will be established by the project supervisor according to project requirements. Supervisors will strive to maintain consistent work hours when possible and notify employees of changes in hours as far in advance as possible. Employees are expected to be in their work areas with tools at start-up time.

- I. Shift work may be utilized as required on the project. No shift differential will be paid.
- J. Employee Cell phones (other than Supervisors) will be left in employee lunch boxes and will only be checked during supervisors' assigned breaks.
- K. The following items or actions will not be allowed on the jobsite:
 - Pets
 - AM/FM radios or tape players.
 - Personal vehicles (except in employee parking area)
 - Unauthorized cameras
 - Weapons/Fireworks
 - Drugs/Alcohol

3. GENERAL RULES

- A. Alta Construction, Inc. expects its employees to, at all times, faithfully, industriously, and to the best of the employee's ability, experience and talents, perform all the duties assigned to the employees. The employee's performance of their work is expected to be done safely, competently and lawfully.
- B. Alta Construction, Inc. prohibits its employees from action or inaction which may (or does) in the Company's sole judgment, harm the Company, its property, its customers, vendors, visitors, your fellow employees or any other person with whom you may affect while working as an Alta Construction, Inc. employee.
- Employees are directly responsible for the maintenance and safe operation of the equipment under their control.
- D. An employee's personal tools are the employee's responsibility. It is recommended that employees provide their own locking toolbox.
- E. Employer reserves the right to search employees' vehicles, tool boxes, and other personal effects on the jobsite or employee parking area for unauthorized items, including company tools, materials, or equipment (see Alta Drug/Alcohol Policy Statement).
- F. Personal clothing worn on the jobsite should be appropriate for the work. Employees should be prepared for seasonal weather. Clothing must meet job safety requirements. Sleeved shirts and full-length pants are required at all times. No sleeveless shirts or tank tops.
- G. The Alta Drug and Alcohol Policy authorizes Alta to test all employees in accordance with the policy and to receive the results of those tests from a laboratory, physician, hospital, clinic or other qualified testing facility at any time during the individual's current or future employment. The employee understands that the Drug/Alcohol Policy is for the creation of a safe workplace and to enhance the productivity of all employees.
- H. Employee's job classification and experience determine starting pay. Raises are not automatic but are based on performance and consistency. Rates of pay and raises are to remain confidential. Disclosure of confidential pay information is prohibited.
- I. When work is done on a personal basis either for one of Alta's customers or in the same line of work the management feel that this is unethical and a definite conflict of interest.

- J. Alta Construction, Inc. is obligated to transport adequate supervision, company owned tools, equipment, and materials to the job sites. Employees are ultimately obligated to transport themselves and their hand tools to the jobsite. Company furnished transportation is a privilege that Alta often provides for its employees. Employees are not necessarily entitled to company furnished transportation.
- K. In addition to the above, the following are examples of employee conduct prohibited by Alta Construction, Inc. The examples are not meant to set forth all conduct that is prohibited, but are meant merely to provide some basic guidance.
 - Being under the influence, to any degree, of intoxicating, narcotic, or non-prescription controlled substances when reporting to work or during the time you are at work. Refer to the Company drug and alcohol policy for more specific information regarding this subject.
 - Theft, misuse or abuse of property or other assets.
 - Insubordination.
 - Disregard for the safety of yourself or others, including failure to use provided safety or protective equipment or gear.
 - Speeding on roads to, on or from the job site.
 - Inefficient, improper or negligent performance of job duties.
 - Falsifying company record, reports or information.
 - Committing a crime or being violent on company property or company time.
 - Failure to report an accident.
 - Fighting, threatening, harassing or otherwise being abusive or offensive.
 - Possession of a weapon, on or in company property or while working for the Company.
 - Willful or knowing violation of any policy or procedure set forth in these Policies or the Safety Policies.
 - Unauthorized use, possession, distribution, delivery or sale of alcohol, illegal drugs, drug
 paraphernalia or controlled substances on company property, during company business, in
 company vehicles and/or during work hours, Refer to the Company drug and alcohol policy for
 more specific information regarding this subject.
 - Unauthorized use or disclosure of confidential information or trade secrets.
 - Action or the failure to act, which detrimentally affects the integrity or reputation of the Company.
 - Abuse or misuse of Alta Construction, Inc. furnished benefits.

4. COMMUNICATION

We hope that your employment with Alta Construction, Inc. will be problem free. Nevertheless, we know that misunderstandings and problems occur. If you have a problem or complaint, there are steps you can take to get it resolved.

- A. You should talk to your immediate supervisor. Your immediate supervisor knows you and your job better than anyone else does. He is in the best position to help since he works with you and is interested in seeing that you are treated properly.
- B. If your immediate supervisor cannot resolve your problem, please bring the problem to the Project Manager or a Corporate Officer assigned to the project. The matter will receive prompt consideration.

5. LIGHT DUTY WORK PROGRAM

If a worker, due to a work related injury/illness, is unable to perform his/her normal duties, and modifications to those duties are not feasible to the company or to the employee, Alta Construction, Inc., with a written release from the employee's primary physician, or referred doctor, may place the employee in a restricted work program.

The duties available to the employee, with a written release for light-duty work by his/her attending physician, will be transitional and temporary in nature (90 days or discretion of management) designed to be both productive to the company and meaningful to the employee.

The primary function of Alta Construction, Inc.'s light-duty work program is rehabilitation of the injured employee, with intent to return the employee to normal productive work duties as soon as he/she recovers from the temporary disability.

The employee that has entered into Alta Construction Inc.'s light-duty work program will not return not normal work tasks until he/she presents the company with written permission (release to normal work duties) from his/her primary physician or referred doctor.

THE FOREGOING POLICY HAS BEEN COMPILED AFTER MUCH CONSIDERATION. WE WANT ALTA TO BE A COMPANY THAT YOU WILL BE PROUD TO BE ASSOCIATED WITH. OUR DOOR IS OPEN TO CONSTRUCTIVE CRITICISM. IF YOU HAVE IDEAS TO HELP THE COMPANY OR SPECIAL NEEDS OF YOUR OWN WE INVITE YOU TO COME IN, SIT DOWN, AND DISCUSS THEM WITH US.

6. TOOL LISTS

6.1. Basic Laborer

The following is a minimum list of tools that each Laborer must provide and maintain at the jobsite (every new hire is required to have the tools within 1 month of hire).

6.1.1.LABORER:

- 1. Tool Box with Lock (not required but encouraged)
- 2. Tool Belt with Nail Bags
- 3. 16 22 oz. Hammer
- 4. Cat's Paw Nail Puller or 18" Flat Bar
- 5. Utility Knife
- 6. 25' Steel Tape
- 7. Common #2 Screwdriver
- 8. Phillips #3 Screwdriver
- 9. Torpedo Level
- 10. Chalk Box with Line

6.1.2.Specialty:

These listed tools are in addition to those listed above, and are required of employees who have over 12 months experience.

- 1. Hand Saw
- 2. Steel Square
- 3. 50'-100'Steel Tape
- 4. 16 oz. Plumb Bob
- 5. 24" Level
- 6. Harness
- 7. Snips
- 8. Wire Wheel
- 9. Kleins
- 10. Socket Set
- 11. Wrenches
- 12. Iron Worker Tools (see below)

6.2 Iron Worker (in addition to the above tools)

- 1. Bolt Bags attachable to Belt
- 2. Ratchet with ³/₄" and 7/8" Sockets
- 3. ³/₄" and 7/8" combination Wrench
- 4. 12" Adjustable Wrench
- 5. RH Aviation snips
- 6. LH Aviation Snips
- 7. 7" speed Square
- 8. Spud Wrenches
- 9. 4 lb. Hammer
- 10. 1/2" Ratchet with full set of sockets
- 11. 24" Level

7. SAMPLE FORMS

7.1 SAFETY AWARDS ORDER FORM

Safety Awards Catalog Order Form

Employee Name:		Date:			
Item #:	Points:	Price:			
Description:					
Size (coats/gloves):	Name for Embr	oidery (coat):			
**************************************	********	*********			
Alta Construction, Inc.					
ADVANCE REQUEST FORM	M				
Date:					
Name:					
Amount: \$					
Note: All advances will be o	deducted from the next pay o	check unless noted otherwise.			
Employee Signature		roved By:			

ALTA CONSTRUCTION, INC.

HEALTH AND SAFETY

PROGRAM

Alta Construction, Inc. P.O. Box 1021 Lyman, Wyoming 82937 (307) 786-4834

INTRODUCTION

It is the policy and top priority of this company to provide an accident-free and comfortable work environment by eliminating recognized hazards from the workplace. Our health and safety program, and specific individual programs, have been developed to assure compliance with federal, state, and local regulations with particular emphasis on the Wyoming Occupational Health and Safety Rules and Regulations that apply to our operations.

In order to maintain the safety standards desired by our company, it is necessary to actively pursue an accident prevention program through all levels of our company, from top management through all employees. Health and safety are functional responsibilities of each supervisor.

Health and safety are of vital interest to everyone in the company: each level of our organization is accountable for safe performance. Compliance with this program and safety and health rules is taken very seriously. This means that failure to comply is sufficient ground for disciplinary action or for termination of employment. These policies are an integral part of the company's personnel policies.

We are committed to providing a safe, accident-free, and healthy work environment for everyone. However, excellent safe and healthy conditions do not occur by chance. They are the result of diligent work and careful attention to all company policies by everyone.

Safety demands cooperation on everyone's part. Thus, it is important that communication be kept open at all times between the management and employees. Workers who notice hazards or other safety problems, or feel that they need additional training, must notify their supervisor. Supervisors and management at all levels must address these concerns and take corrective action when warranted.

Everyone is obligated to be knowledgeable of the standards applicable to their area or job, and just as important, to abide by them. Supervisors must instill a positive attitude and safety awareness in their subordinates through personal adherence, personal contact, training, and regularly scheduled safety meetings. It is the duty of all employees to perform their work with maximum regard for the safety of themselves and co-workers.

Our safety policies are based on past experience and current standards, and are also an integral part of the company's personnel policies. This means that compliance with the policies is a condition of employment and must be taken seriously. Failure to comply is sufficient grounds for disciplinary action or for termination of employment.

Safety and health are a top priority in this organization and are every bit as important as productivity and quality. In fact, they go hand in hand. Of course the best reason for you to observe these policies is because it's in your own self-interest to do so. Conscientiously following them can help you stay safe, healthy, and able to work, play, and enjoy life to its fullest.

RESPONSIBILITIES

Our goal is to protect employees from injury while working for our company. This must receive top priority from everyone.

Duties and responsibilities of all personnel under our health and safety program are in the following: (Each job description may designate these duties but is responsible for their implementation)

HEALTH AND SAFETY MANAGER (if appointed. Or safety committee, if used.)

- a. Provides all levels of management the services and technical advice needed for proper administration of the health and safety program.
- b. Develops programs and technical guidance to identify and remove physical, chemical, and biological hazards from facilities, operations, and site.
- c. Assists management and supervisors in the health and safety training of employees.
- d. Conducts inspections to identify unhealthy or unsafe conditions or work practices. Prepares written reports of inspections
- e. Recommends programs and activities that will develop and maintain incentives for and motivation of employees in health and safety.
- f. Recommends disciplinary action for violations of health and safety rules.
- g. Maintains the state health and safety poster, emergency telephone numbers, OSHA Form 300, and other notices required by Wyoming Workers' Safety. Ensures this information is posted in places where employees can see them on each job.
- h. Develops and maintains accident and incident investigation and reporting procedures and systems. Investigates serious or reportable accidents and takes action to eliminate accident causes. Reportable incidents consist of fatalities, lost workday cases, and without lost workdays requiring medical treatment. Keep management informed of findings.
- i. Report accidents that result in an occupational fatality or three or more hospitalized workers to Wyoming Workers Safety at 777-7441 within eight (8) hours of occurrence.

SUPERINTENDENT

- a. Familiarizes him/her-self with health and safety regulations related to his/her area of responsibility.
- b. Directs, implements, and coordinates health and safety program elements and activities within area of responsibility.
- c. Requires all employees supervised to use individual protective equipment and safety devices.
- d. Ensures that safety equipment is available, maintained, used, and stored correctly.
- e. Ensures that all persons within area of responsibility receive job safety and health training as required.
- f. Conducts (monthly/quarterly) health and safety inspections of work area. Directs correction of unsafe conditions.
- g. Conducts (weekly/monthly) safety briefings with all supervisors and/or workers.
- h. Ensures that supervisors are aware of and comply with requirements for safe practices.
- i. Investigates all accidents within area of responsibility. Reviews all accidents/incidents with supervisors and workers involved. Ensures accident reports and Workers' Compensation forms are completed and submitted as appropriate. Insures that corrective action is taken immediately to eliminate the cause of the accident.
- j. Requires all subcontractors and subcontractor personnel working within the company's facilities to comply with health and safety regulations.
- k. Maintains copies of applicable programs and Wyoming Worker's Safety forms in the work area, in accordance with company practice and policy. Examples may include the hazard communication program, material data safety sheets, OSHA 300 Injury Log if the work area is not located near/with the central office.

FIRST LINE SUPERVISOR, FOREMEN

- a. Be familiar with, explains, and enforces health and safety regulations that apply to company operations within his/her area of responsibility.
- b. Ensure that persons under his/her supervision use safety devices and proper individual protective equipment.
- c. Instructs and trains all persons within area of responsibility in job health and safety requirements.
- d. Conducts frequent and regular safety and health inspections of his/her work areas and ensures that no unsafe conditions exist in area of responsibility.
- e. Conducts weekly (or more often if needed) safety briefings with all workers under his/her supervision.
- f. Ensures that injuries are treated promptly and reported properly. Investigates all accidents/incidents, obtains all pertinent data, completes and submits the appropriate report(s), and initiates/takes corrective action.
- g. Acts on reports of hazards or hazardous conditions reported to them by employees.

OFFICE MANAGER/CLERK

- a. Maintains all records and reports of accidents that have taken place during company operations. These forms and reports may include the OSHA Form 300 Injury/Illness Log, the OSHA Form 101 Supplementary Record of Occupational Injury and Illnesses. The equivalent form Wyoming Workers' Safety and Compensation Division Report of Occupational Injury or Disease may be kept instead of the OSHA 101.
- b. Ensures that employee's Report of Occupational Injury or Disease report is filed with the Worker's Compensation office within ten days of employee's notification of an occupational injury or disease.
- c. Processes all paperwork associated with accidents, on-site inspections and in-house audits. Maintains permanent record for company files.
- d. Maintains all medical records, evaluations and exposure monitoring records for a period of 30 years.
- e. Maintain all training records for a minimum of three (3) years.

ALL EMPLOYEES

- a. Be familiar with and comply with proper health and safety practices.
- b. Use the required safety devices and proper personal protective safety equipment.
- c. Notify supervisor immediately of unsafe conditions/acts, accidents, and injuries.

INCIDENT INVESTIGATION AND REPORTING

WORKERS' COMPENSATION CLAIMS

The following actions will be taken/followed on all accidents/injuries being submitted as a Workers' Compensation claim.

- a. Injured employees must report all accidents/injuries to their supervisor immediately (within 24 hours), who in turn will notify other appropriate company officials, such as the safety manager or claims manager. All accidents / incidents will be investigated by the safety manager, supervisor, or the claims manager to determine the facts and take corrective action to prevent recurrence.
- b. If medical attention is needed, the injured employee must be accompanied by their Supervisor or an office person to the approved medical facility. If the injury requires emergency attention, the injured employee will be taken to the nearest qualified medical facility.
- c. Employees, within ten (10) days after notification to the employer, must complete the Worker Information section only of the Workers' Safety and Compensation Report of Occupational Injury or Disease forms package.
- d. The supervisor or claims manager will complete the Employer's Information section of the same report within ten days of the notification.
- e. The accident investigation must confirm that the injury was job related for the resultant claim to be valid.
- f. Injured employees will be entered into a modified job program, i.e. light duty, restricted duty, part-time duty, when such is recommended by the attending physician.

OSHA FORM 300 INJURY/ILLNESS LOG

The OSHA Form 300 log of all-recordable occupational injuries and illnesses is maintained for and/or at each work facility. In some cases, the log may be kept at the main office (this involves ensuring the information from the initial accident report is posted onto the master form in the main office within six day after the accident has occurred). The summary section of the OSHA Form 300 must be posted at each work facility/site by February 1st of the following year and remain in place until April 30th.

TRAINING

Training and education cannot be over-emphasized as a means of learning a healthful and safe approach to employee work effort. Knowledge of the safety rules and how and when to function under the rules, supplemented by compliance, is essential to safety.

- a. Employees scheduled for any safety and health training will attend such training.
- b. New employees will be provided orientation training and will be furnished information and literature covering the company health and safety policies, rules, and procedures. This orientation training must be provided prior to the employee's exposure to the work environment.
- c. Individual job/task training, to include the applicable regulations / standards for their job, will be provided to all employees. Included in this training is: the recognition, avoidance, and prevention of unsafe conditions, areas and activities that require personal protection equipment, and how to use protective equipment (such as respirators, etc.).
- d. (Monthly/quarterly) on-going safety training sessions will be conducted to provide information and training on new equipment, new procedures, new chemicals, refresher/remedial training in specific areas, or meet annual requirements. Such training may be held in conjunction with the safety briefings/meetings addressed elsewhere in this program.
- e. Various individual Wyoming Workers' Safety programs specify that training be provided to employees. Supervisors will ensure their employees are scheduled and provided this training as required. Examples include fire extinguisher training, confined space entry, respirator care and use, hazard communication, lockout/tagout procedures, industrial truck/forklift operation, and electrical work, to name a few.
- f. Training addressed above will be documented in the employees' personnel records and/or in a master training record.
- g. Alta OSHA training guidelines and outlines will be kept on file at our main office. MSHA training will be secured through a private training source whose training programs are MSHA approved.

EMPLOYEE TRAINING REQUIREMENTS

Employees shall receive task specific training at individual job-sites regarding tools, equipment, specific hazards, etc. This training may be done in pre-work conferences or as need dictates while working. Additionally, Alta employees shall receive annual training in the following areas:

- a. All hazardous atmospheres to which individual employees may be exposed. Affected employees only will be trained
- b. Affected employees only will be trained in proper respiratory protection.
- c. Hazard communication and right-to-know.
- d. Electrical Safety Lockout/Tagout
- e. Confined Space Entry
- f. Hazard recognition
- g. Ladder use and safety
- h. Scaffold safety
- i. Personal protective equipment selection and use
- j. Portable fire extinguishers, access and egress
- k. Hand tool safety
- 1. Blood borne pathogens awareness
- m. Excavation safety standards

JOB SAFETY ANALYSIS & SAFE OPERATING PROCEDURES

General

Job Safety Analysis (JSA's) is a process of determining physical requirements, environmental conditions and safety factors relating to a specific job or task. JSA's are best used for stationary or repetitive production tasks or product movement, in which the job, equipment and work environment change very little.

Safe Operating Procedures (SOP's) are written step-by-step procedures for a specific non-repetitive task which may be hazardous or critical. The purpose of an SOP is to provide written guidance for a particular task such that any qualified person can successfully and safely complete the task. SOP's are best developed and used for highly skilled jobs and when the equipment and work environment change often. For example, an SOP with appropriate warnings and cautions, would best be developed and used for tasks such as confined space entry, maintenance tasks, lockout-tagout, welding operations, system startup and shutdown.

JSA's/SOP's provide

- PPE determination process
- Resource for supervisors to train new employees
- Control of job steps
- Identification and control of potential hazards
- Benchmark for accident investigation
- Review of employee performance

Responsibilities

Management:

- ensure complete & effective JSA's are developed for all production tasks
- ensure JSA's are reviewed with new hires and annually thereafter
- utilize JSA's and SOP's in accident investigations and retraining
- ensure JSA's & SOP's are modified if a new step or process is added
- ensure SOP's are developed for non-routine tasks that have a high degree of safety risk

Supervisors:

- use JSA's and SOP's to train all new employees
- use JSA's and SOP's when performing job performance evaluations
- develop and submit JSA's for all tasks in their area of responsibility
- review JSA's annually with all employees assigned to their department

The most important person in JSA process is the Supervisor, who is in constant contact with employees and should be familiar with the hazards in their Department. Supervisors are in a better position to recognize and correct unsafe acts and conditions as they occur.

Safety Coordinator:

- assist Management and Supervisors in developing JSAs and SOPs
- maintain a master file of all JSAs and SOPs
- ensure new JSAs or SOPs are developed for new equipment or processes
- ensure SOPs are posted for tasks that occur at fixed locations (i.e., Bench Grinders, Boiler Operations, etc.)

Documents

Forms and documents available for developing SOPs and JSAs are:

Job Safety Analysis Form Job Safety Analysis Task Steps Task Hazard Assessment Worksheet Task Hazard Prevention & Control Worksheet

SOP Process

A Safe Operating Procedure consists of:

A written step by step procedure for a specific task A description of possible hazards & cautions Hazard Control steps List of required personal protective equipment (PPE) Qualifications required for the operation SOP's may be permanently posted or consist of multi-page instructions that are to be reviewed prior to each time a qualified person performs the task.

SOP's are developed and completed by the following steps:

- 1. Draft Development of SOPs
- 2. Review and approval of SOPs
- 3. Implementation of SOPs
- 4. Review and updating SOPs
- 5. Periodic Training using SOPs

JSA Process

A Job Safety Analysis consists of:

- 1. Job Physical Requirements
- 2. Job Environmental Conditions
- 3. Personal Protective Equipment required
- 4. Sequence of Basic Job Steps
- 5. Potential Accident or Hazards associated with each step
- 6. Safe Job Practice for each step

Job Safety Analysis are completed through the followings steps:

- 1. Development of JSA's
- 2. Review and approval of JSA's
- 3. Implementation of JSA's
- 4. Review and updating JSA's
- 5. Periodic Training using JSA's

Development of JSA/SOP

There are many ways to develop JSA/SOPs; however, observation and team approach has proven the most reliable. By watching the tasks, the observer can see firsthand what is required, recognize the hazards and recommend alternatives. Below is the sequence used to develop a JSA/SOP:

- 1. Select the most experienced employee to observe
- 2. Explain the purpose of your observations
- 3. Observe the task and define the steps used to complete the assignment
- 4. Record the basic steps
- 5. Review the steps with the observed Employee for clarity
- 6. Observe the task a second time and identify any hazard potentials and record the findings.

Hazard types include:

Impact

Contact with Chemicals

Caught on or between

Lacerations

Burns

Fall or Slip

Over exertion

Cumulative Trauma

- 7. Observe the task a third time to develop corrective measures to all hazard potentials
- 8. Review your findings with the Employee for clarity
- 9. Complete the JSA form or write SOP

Review and Approval of JSA/SOP's

After the draft copy of the JSA/SOP has been completed, it should be reviewed by a team consisting of the Safety Coordinator, Department Manager, and Supervisor and affected Employees. All questions should be discussed by the team. A final version is then drafted.

Implementation of JSA/SOP's

Completed JSA/SOP's are then reviewed with the entire department by the Supervisor. New hires and transfers should have the JSA/SOP's reviewed with them and made part of the Employee's job performance evaluation.

Updating JSA/SOP's

All new hazards, operations, equipment and tools should be updated on the JSA/SOP's and communicated to all Employees as soon as possible. JSA's will become outdated if not reviewed periodically.

Periodic Training and Retraining

Annually, the JSA/SOP's should be reviewed by the Supervisors with all Employees. JSA/SOP's should be reviewed with the Employee during an accident investigation to help identify possible causes or problem areas.

BEHAVIORAL BASED SAFETY PROGRAM

This behavioral based safety program is used to identify behaviors (Safe or At Risk) on our job sites by peers evaluating peers. Through this process we will be able to determine Safe or At Risk behaviors on a job specific basis and take a proactive approach to modify behaviors which influence attitude and drive continuous improvement.

ACTION

The Operations Manager and/or Safety Coordinator will hold a meeting to explain the job observation process to all employees.

INFORMATION

This is a tool which will measure safe and at risk behaviors.

- Job observations should be documented for both safe and at risk behaviors so it can be a proactive tool and not a fault-finding medium.
- All employees on the job should be informed of this process so the level of awareness of safe and at risk behaviors is achieved.
- Identify worksite for implementation.

Pre-Job Plan

Determine frequency for completion of job observation report.

Anomaly Observation Cards

Select employees that are trained to use program and issue Anomaly Observation Cards as required.

Employees are required to complete Anomaly Observation Cards based on observations made on specific tasks.

- a) Anomaly Observations
- b) Reinforcement (R/C) Correction
- c) Follow-up action.

The Anomaly Observation Cards are to be turned in to the Operations Manager at the end of the day.

COMPLETE THE ANOMALY OBSERVATION REPORT.

The Managers or designee is to complete the summary on a pre-determined basis (weekly, monthly, end of job, etc.) and forward to the Safety Coordinator for completion of the Trend Analysis (graphical representation of observations). See Attachment — Schedule B

ANOMALY OBSERVATION SUMMARY SHEET'

Retain Job Observation Cards for Six months and destroy.

Trend Analysis

Once completed by the Safety Coordinator, the analysis will be discussed at the following safety meeting. This is a tool for use at Tailgate & Safety meetings to focus attention on behaviors that are safe and at risk on job sites. (What is working and what needs to be improved.)

PERSONAL PROTECTIVE EQUIPMENT (PPE)

MANDATORY PPE

All employees must wear the following protective equipment on all jobsites:

- Hard hat provided by Alta Construction, Inc.
- Safety glasses first pair provided by Alta Construction, Inc.
- Steel-toed footwear employees responsibility

Additional protection may be required depending on the work scope and potential hazards.

Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, must be provided, used, and maintained in a sanitary and reliable condition.

Where employees provide their own protective equipment, the employer must assure its adequacy, including proper maintenance, and sanitation of such equipment.

The hazard assessment must indicate a determination if hazards are present or are likely to be present, which necessitate the use of PPE. The certifier's name, signature, date(s) should be present on the assessment documents. Consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected. Procedures must be in place to ensure defective or damaged PPE is not used. PPE that is in disrepair must be

Procedures must be in place to ensure defective or damaged PPE is not used. PPE that is in disrepair must be discarded or removed from service until repaired.

PROTECTIVE CLOTHING - GENERAL

The wearing of loose or ragged clothing must be avoided when working around moving machinery because it can get caught in machinery, moving belts, etc. Long shirt tails must be tucked in trousers.

Hair long enough to be potentially hazardous while working around moving machinery or rotating tools and equipment shall be secured. Hair styles that make it impossible to wear a hard hat properly are not permitted.

HARD HATS

Hard hats shall be worn by all personnel at all work locations. Do not alter hard hats in any way that could reduce its qualities. This includes drilling of any hole, carving, etching, painting, etc. Do not place objects between the liner and the shell while wearing the hat. Employees should replace liners periodically and replace the hat when it becomes damaged or brittle. It is recommended that liners be replaced at least every six months, and hats at least every two years.

EYES AND FACE

Safety glasses or face shields shall be worn by all personnel to protect eyes and face from potential hazards. Contact lenses provide no protection to the eye and should be worn with other eye protection. They should not be worn in high-dust conditions or in the presence of irritating vapors or smoke. Advise your team leader if you routinely wear any type of contact lenses. This information may be needed during a medical emergency. Impact-type goggles shall be worn during activities involving flying or falling objects or particles such as:

- Chipping, cutting, or breaking stone, brick and concrete
- Sing hammers, chisels or other steel hand tools
- Scraping paint or scale from wood or metal surfaces
- Using a wire brush to clean threads, fittings or metal and wood surfaces
- Grinding on abrasive wheels (even when a glass or plastic guard is provided)
- Using compressed air for cleaning purposes to clean or blow out debris.

Splash-proof chemical goggles and face shields shall be worn when handling potentially hazardous chemical liquids and solids or in any other operation where the eyes may be exposed to potentially hazardous chemicals. Never wear face shields alone as eye protection. Use face shields in addition to eye protection to protect the face and neck from flying particles, sprays of chemicals, splashes of molten metal and from hot solutions. Welding, brazing, soldering or cutting operations require the use of shaded lenses. Abrasive blasting and sandblasting require a hood designed specifically for this purpose. The hood should have appropriate eye and face protection: forced-air ventilation for the operator, and appropriate air purifying respirators for others who may be exposed.

HEARING

- Hearing protection shall be worn by all workers exposed to 8-hour, time-weighted average (TWA) noise levels of 85 dB or above to prevent hearing loss. This may require wearing a combination of hearing protection devices (for example, earplugs and ear muffs).
- Use hearing protection whenever you're exposed to mobile noise sources such as power tools and equipment.
- Employee will inspect hearing protection prior to use and replace them is there is any visible defects.
- Alta Construction, Inc. will hold annual training courses to ensure proper usage of hearing protection.

HAND

Employees shall wear appropriate hand protection when performing operations that expose the fingers and hands to cuts, scrapes, bruises, burns, and chemicals.

FOOT

Field personnel are required to wear steel-toed footwear when working in areas outside of the office setting. Acceptable footwear must comply with the following:

- Steel-toed
- Provide ankle coverage
- Have a notched heel that prevents slippage when climbing ladders

Training should be given to employees concerning when to wear PPE, what PPE should be worn, how to put on and take off and adjust PPE. The limitations of the PPE and its use, care, and maintenance should also be included in the training. Each affected employee must demonstrate an understanding of training received and the ability to use PPE properly. When there is a reason to believe that any employee who has been trained does not have the required understanding and skill or there are changes in the workplace, the employee must be retrained. PPE training should be documented. The certification should include the employee name, the dates of training, and the training content

WORKPLACE SAFETY INSPECTIONS

This company has a procedure for conducting inspections of workplaces / jobsites for compliance with health and safety rules. The purpose of the in-house inspection is to identify hazards and unsafe practices before they cause an injury or accident.

Formal safety and health inspections will be conducted under the following minimum timelines:

- a. Health and Safety Manager: (Monthly/quarterly) of all fixed facilities and shops.
- b. Manager/superintendent: (Monthly/quarterly) of his/her area of responsibility.
- c. Supervisors: (Weekly/monthly/quarterly) of area of responsibility, not in conjunction with the above inspections.
- d. The company's health and safety program will be reviewed at least annually.
- e. Wyoming Workers' Safety Technical Assistance, private consultation services, and insurance company representatives may conduct on-site consultation and inspections, if desired and requested.

After completing jobsite or facility inspections, the person making the inspection will:

- a. Discuss findings with employees/persons responsible for creating the condition. Invite their comments, suggestions and aid.
- b. Ensure recommended corrections/charges are transmitted to/discussed with the proper supervisor/person for correction.
- c. Follow up on changes, corrections, and other actions necessary.
- d. Provide copy of checklist to company health and safety person, along with statement of corrective actions taken or still required.

HARASSMENT

Alta Construction, Inc. will not tolerate harassment or intimidation of our employees on any basis prohibited by law, including race, color, sex, age, religion, national origin, handicap, disability, marital status, or veteran status. It is the policy of Alta Construction that any harassment, including acts crating a hostile work environment or any other discriminatory acts directed against our employees, will result in discipline, up to and including discharge. The Company also will not tolerate any such harassment of our employees by our clients or vendors.

For purposes of this policy, sexual harassment is defined as any type of sexually oriented conduct, whether intentional or not, that is unwelcome and has the purpose of effect of creating a work environment that is hostile, offensive or coercive.

Employees must bring any violation of this policy to the immediate attention of their supervisor or the company president. Alta Construction will thoroughly investigate all such claims with due regard for the privacy of the individuals involved. Any employee who knowingly retaliates against an employee who has reported workplace harassment or discrimination shall be subject to immediate disciplinary action, up to and including discharge.

ACCESS TO EMPLOYEE MEDICAL AND EXPOSURE RECORDS

Purpose

The purpose of this procedure is to insure right of access to relevant exposure and medical records to employees and/or their designated representatives.

Key Responsibilities

ALTA CONSTRUCTION, INC. Safety Manager

- Develops local medical records practices for all worksites in accordance with this procedure and ensures employees are aware of the requirements of this procedure.
- Responsible for the review, implementation and maintenance of the local worksite medical records procedure.

Project Manager

• Responsible for the implementation and maintenance of the medical records procedure for their facility and ensuring all assets are made available for compliance with the procedure.

Employees

• All shall be familiar with this procedure and have access to their records.

Overview

This section applies to all employee exposure and medical record, and analysis thereof, made or maintained in any manner, including on an in-house or contractual (e.g., fee-for-service) basis.

- Trade secret information disclosure must follow requirements as stated in 29 CFR 1910.1020 (f) (8).
- Recognized collective bargaining agents who have statutory authority to represent the interests of the
 employees within the bargaining unit are automatically considered designated representatives. While
 these representatives do not have the right to secure individual medical records without written consent
 of the employee, they have the right of access to employee exposure records and analysis without
 employee consent.

Definitions

Access means the right and opportunity to examine and copy.

Analysis of exposure or medical records means any compilation of data, and research, or other studies based, at least in part, on information collected from individual employee exposure or medical records or other sources including information from health insurance claim forms provided that either the analysis must have been reported to the employer or no further work is being done by the person responsible for preparing the analysis.

Designated representative will mean any individual or organization to which an employee gives written authorization to exercise a right of access. For the purposes of access to employee exposure records and analyses using exposure or medical records, a recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

Employee exposure records could include any of the types of information listed below:

- Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained;
- Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs;
- Material safety data sheets indicating that the material may pose a hazard to human health; or In the absence of the above, a chemical inventory or any other record which reveals where and when used and the identity (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.

Employee medical records are records that concern the health status of an employee and are made or maintained by a physician, nurse, or other health care personnel or technician. "Employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse or other health care personnel, or technician.

NOTE: The following will not be considered a medical record:

- Physical specimens, such as blood or urine samples, which are routinely discarded.
- Health insurance claims, accident investigation reports and other non-medical correspondence if maintained separately from the medical file.
- The record of any voluntary employee assistance program (alcohol, drug, etc.) if maintained separately.
- Records created solely in preparation for litigation which are privileged from discovery under applicable rules of procedure or evidence.

Specific Written Consent means a written authorization containing the following:

- The name and signature of the employee authorizing the release of medical information.
- The date of the written authorization.
- The name of the individual or organization that is authorized to release the medical information.
- The name of the designated representative (individual or organization) that is authorized to receive the released information.
- A general description of the medical information that is authorized to be released.
- A general description of the purpose for release of the medical information.
- A date or condition upon which the written authorization will expire (if less than one year).

A toxic substance or harmful physical agent is defined as any chemical substance, biological agent (bacteria, fungus, virus, etc.) or physical stress (noise, heat, cold, ionizing radiation or non-ionizing radiation, hypo or hyperbaric pressure, etc.) which:

- Is regulated under federal law or rule due to a hazard to health.
- Is listed in the National Institute of Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS).
- Shows positive evidence of acute or chronic health hazard in human, animal or other biological test by or known to the employer.
- Has a Material Safety Data Sheet indicating that the substance may pose hazard to human health.

Procedure

The Safety Manager will maintain applicable medical and exposure records for all employees. All requests to access medical and exposure records and analysis based on those records must be submitted to using the forms provided for that purpose.

Access to records is provided in a reasonable time, place and manner. Access to records must be provided in a reasonable time, place and manner. If access to records cannot reasonably be provided within fifteen (15) working days, ALTA CONSTRUCTION, INC. shall within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available.

Personal identifiers (name, address, social security number, payroll number, etc.) are removed from records before access is granted. Whenever access is requested to an analysis which reports the contents of employee medical records by either direct identifier (name, address, social security number, payroll number, etc.) or by information which could reasonably be used under the circumstances indirectly to identify specific employees (exact age, height, weight, race, sex, date of initial employment, job title, etc.), personal identifiers must be removed before access is provided.

ALTA CONSTRUCTION, INC., upon request, will assure the prompt access of representatives of the Assistant Secretary of Labor for Occupational Safety and Health to employee exposure and medical records and to analyses using exposure or medical records.

Except for a recognized collective bargaining agent, any designated representative must have the employee's written permission for access to exposure records and analyses. It is necessary however, for the union representative to specify the occupational need for access to records absent the employees consent. Union representatives must have the employee's written permission to access medical records.

Copies of medical records are provided at no cost to employees. Whenever an employee or designated representative requests a copy of a record, that record must be provided at no cost.

Any review of medical or exposure records by an employee or union representative shall be done on his or her own time, outside of normal working hours, at a time mutually agreeable to the parties. The review will be conducted in person with the individual requesting access to the records.

The employee is entitled access to his or her medical records except when a physician determines that this knowledge would be detrimental to the employee's health as in such cases of terminal illness or psychological conditions. However, if the employee provides a designated representative with specific written consent, access to medical records must be provided even if the physician has denied the employee access to the records.

The authorized physician, nurse or other responsible health care personnel maintaining employee's medical records may delete the identity of anyone who has provided confidential information concerning the employee's health status but cannot withhold the information itself.

When an analysis of medical records identifies the employee, a physician may remove direct or indirect personal identification. If this cannot be done, the personally identifiable portions need not be provided to the person seeking such information.

Employees and their designated representatives will be permitted upon request access to past and present exposure data to toxic substances or harmful physical agents.

Copies of exposure records of other employees with past or present job duties or working conditions like or similar to those of the employee will also be provided upon request.

Any employee or designated representative is also permitted access to any record of exposure information which pertains to a new workplace or condition(s) to which the employee is being assigned or transferred.

Records Retention

- Medical records must be preserved and retained for the duration of employment plus 30 years.
- Employee exposure records must be retained for 30 years.

Transfer of Records Should the Alta Construction, Inc. Cease to Do Business

Whenever ALTA CONSTRUCTION, INC. ceases to do business it shall transfer all records subject to this section to the successor employer. Whenever ALTA CONSTRUCTION, INC. either is ceasing to do business and there is no successor employer to receive and maintain the records, or intends to dispose of any records required to be preserved for at least thirty (30) years, ALTA CONSTRUCTION, INC. shall transfer the records to the Director of the National Institute for Occupational Safety and Health (NIOSH) if so required by a specific occupational safety and health standard.

Employee Information

Employees are informed of the provision of recordkeeping upon initial assignment and annually thereafter. Upon an employee's first entering into employment, and at least annually thereafter, information must be given to current employees of the existence, location, availability and the person responsible for maintaining and providing access to records and each employee's rights of access to these records.

The Access to Employee Exposure and Medical Records Standard (29 CFR 1910.1020) will be readily available for review by employees upon request.

A copy of the employee notice that will be used to comply with the employee information requirements is included with policy. This notice will be posted on those bulletin boards where other notices normally appear.

AUTHORIZATION LETTER FOR THE RELEASE OF EMPLOYEE MEDICAL RECORDS

I, hereby authorize the		
(Full name of employee)	(Name of Organization)	
to release to ALTA CONSTRUCTION	, INC., the following medical record(s):	
Give specific de	escription of the information to be released)	
I give my permission for the medic	al information to be used for the following purpose(s):	
	r any other use or reason. horization expires twelve (12) months from today's date unless I specify a onths which is	
Signature of employee or His/her legal representative	Date of Signature	
Reviewed on: with (Date)	(Signature of Organization's Representative)	
Copies given: Yes No		

ACCESS TO MEDICAL/EXPOSURE RECORDS NOTICE

Federal Regulation 29 CFR 1910.1020 requires us to inform you that ALTA CONSTRUCTION, INC. does keep records designated as Employee Exposure and Employee Medical Records.			
The above regulation gives you the right to review those records wit	:h certain exceptions.		
The records are maintained in the Safety Department and the Safety	/ Manager is responsible for the records.		
A copy of CFR 1910.1020 is available for viewing upon request to the	e Safety Manager.		
Signature E	Date		
Note: This notice must be posted annually			

ACCIDENT INVESTIGATION

Purpose

The purpose of the Alta Construction, Inc. Accident Investigation Program is to investigate all accidents and near misses, to identify the root cause(s) and develop corrective actions that can be taken to prevent future occurrences. Assigning blame to employees is **not** the purpose of this program.

Scope

Alta Construction, Inc. strives to provide all employees and on-site contractors with a safe and healthy workplace. This program is integrated into our company's written safety and health program and is a collaborative effort that includes all employees. The Program Administrator is responsible for the program's implementation, management and recordkeeping requirements.

Program Responsibilities

Management. The management of Alta Construction, Inc. is committed to the accident investigation process. Management supports the efforts of the Program Administrator by pledging financial and leadership support for the investigation of accidents and near miss events. Management supports an effective accident reporting system and responds promptly to all reports. Management regularly communicates with employees about the program. Program Administrator – Taylor Hicks. The Accident Investigation Program Administrator reports directly to upper management and is responsible for this policy and program. All evaluations, investigations, training and recommended solutions are coordinated under the direction of the Program Administrator in collaboration with management. The Program Administrator monitors the results of the program and determines additional areas of focus that are needed. The Program Administrator also:

- Ensures supervisors and employees are properly trained to conduct accident investigations
- Ensures a system is in place for employees to report accidents and near misses
- Ensures accurate records are maintained and provides documentation upon request
- Follows up on all corrective actions suggested during the accident investigation process
- Ensures approved corrective actions are implemented in a timely manner
- Conducts an annual review of the program
- Ensures that proper equipment is available to conduct the investigation. Equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, marking devices such as flags, equipment manuals, etc.

Managers and Supervisors. Managers and supervisors of Alta Construction, Inc. are:

- Accountable for the health and safety of all employees within their departments through their active support of the accident investigation program
- Required to attend accident investigation training to familiarize themselves with the elements of the program
- Responsible for ensuring that employees under their supervision have received the appropriate training on accident and near miss reporting
- Responsible for initiating the accident investigation process within 24 hours of an incident
- Responsible for implementing approved corrective actions and ensuring they are completed appropriately through active follow-up

Employees. Every Alta Construction, Inc. employee is responsible for conducting himself/herself in accordance with this policy and program. All employees will:

- Attend accident and near miss reporting training
- Report all accidents and near misses as soon as possible to their supervisor, but no longer than two hours after the time of the incident

Reporting

All employees are required to report any accident or near miss to their immediate supervisor within two hours of the incident. The Accident Investigation Report Form (see **attached**) is to be used by the supervisor to document the details of an accident or near miss and any proposed corrective action(s) for future prevention.

Supervisors/Managers are to begin the accident investigation process within 24 hours of the initial incident. A copy of the initial report is to be forwarded to the Program Administrator within 48 hours of an accident or near miss. Required incidents must be verbally reported to applicable regulatory agency(s) within 8 hours of their discovery. Incidents must also be reported to the client as soon as possible, or in a timely manner (within 24 hours of incident).

All employees involved in accidents that cause injuries, death and / or property damage to Alta Construction's or client property will be subject to drug and alcohol testing in accordance with the Drug and Alcohol Testing Policy.

Event Reconstruction

Interviews. Within 24 hours, the manager or supervisor of the employee who was involved in the accident or near miss will begin interviewing employees who were involved or in close proximity to the incident, or who are familiar with the related process or work practices. All individuals will be interviewed separately. A minimum of two people must be interviewed for any accident or near miss reported.

Written incident reports should be prepared and include an incident report form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, investigation board member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included.

Event Timeline. An event timeline will be developed for each reported accident or near miss. This timeline will start with the accident or near miss and be developed in reverse using information obtained from the interviews. Each task, event and employee decision that took place are to be added to the timeline. Also, the timeline will include all physical and emotional conditions known at the time of each action, event or decision along with the employee's knowledge, motivation, goals and focus at the time of any action, event or decision. Initial identification of evidence immediately following the incident might include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions.

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.

Identifying Root Cause(s). After the timeline has been established, the investigator(s) will identify the root cause(s) that contributed to the accident or near miss.

Recommending Specific Solution(s). After the root causes are identified, corrective actions will be identified to reduce or eliminate those hazardous conditions. The manager/supervisor and employees will develop and propose specific improvements that are operationally feasible. Those possible improvements will be submitted to the Program Administrator for validation, final approval and guidance for an implementation strategy.

When selecting and recommending these corrective actions, possible solutions will be prioritized using the following hierarchy. In this hierarchy of hazard control, the most desirable solutions come from the first level, with the following levels offering increasingly less desirable options.

- 1. Elimination eliminating the hazard from the workplace
- 2. Substitution replacing a hazardous substance or activity with a less hazardous one
- 3. Engineering controls providing guards, ventilation or other equipment to control the hazard
- 4. Administrative controls developing policies and procedures for safe work practices
- 5. Personal protective equipment using respirators, earplugs, safety glasses, etc.

Recommended corrective actions will come from the highest possible level of the hierarchy of hazard control.

Monitoring Changes. Once implemented, corrective actions will be monitored by the manager/supervisor for effectiveness, to verify that net risk is not increased and to determine that the root cause of the incident has been eliminated or reduced. The manager/supervisor will conduct follow-up interviews with employees who were part of the accident investigation to determine if the implemented corrective actions require any adjustments to provide maximum safety to the employees.

Employee and Supervisor Training

New and previously untrained employees will receive training about this program and how it will be applied when investigating near misses and accidents. Employees and supervisors will receive refresher training at least every five years. Upon hire or promotion into their position, managers and supervisors will be trained on Alta Construction, Inc. investigation philosophy and the methods that should be used to conduct an accident investigation according to this program.

The minimum training for all employees will include the following elements:

- An explanation of the Accident Investigation Program and their role in it
- An emphasis on the importance and method of prompt reporting of accidents and near misses
- Review of the accident investigation form, with emphasis on determining contributing factors and corrective actions

Periodic Program Review

At least annually, the Program Administrator will conduct a program review to assess the progress and success of the program. The review will consider the following:

- Evaluation of all training programs and records
- The need for retraining managers, supervisors and employees
- The length of time between accidents, investigations and implementation of corrective actions
- The program's success based upon comparison to previous years, using the following criteria:
 - o Frequency of accidents and near misses
 - o Frequency of workers' compensation claims
 - o Insurance carrier's loss analysis
 - Employee feedback through direct interviews, walk-through observations, written surveys and questionnaires and reevaluations

Record Retention

Alta Construction, Inc. will maintain the information from accident investigations and training records for at least 3 years. All accident investigation records will be kept by the Program Administrator.

BENZENE AWARENESS

Purpose

The purpose of this program is to define work practices, administrative procedures and engineering controls to protect employees exposed to benzene concentrations above the OSHA action level. This plan shall be implemented and kept current by the Safety Manager as required to reflect the most recent exposure monitoring data.

Scope

This program covers all employees who may be exposed to benzene in the course of completing job duties. This written plan shall be made available to the Assistant Secretary, the Director, affected employees and designated employee representatives. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers ALTA CONSTRUCTION, INC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Employees will be aware of provisions of site specific contingency/emergency plans by either ALTA CONSTRUCTION, INC. or of a facility owner.

The ALTA CONSTRUCTION, INC. Safety Manager will develop and implement project/task specific benzene control procedures prior to the start of activities that may include exposure to benzene. ALTA CONSTRUCTION, INC. will be aware of an owner's contingency plan provisions and all employees must be informed where benzene is used in host facility and aware of additional plant safety rules.

Possible locations where employees may be exposed to benzene during their job functions may include, but not limited to: petroleum refining sites, tank gauging (tanks at producing, pipeline & refining operations) and field maintenance operations.

Definitions

- Action Level means an airborne concentration of benzene of 0.5 ppm calculated as an 8-hour timeweighted average.
- Benzene a toxic, colorless liquid or gaseous material. Benzene has an aromatic odor, is not soluble in water and is flammable.
- Employee exposure exposure to airborne benzene that would occur if the employee were not using respiratory protective equipment.
- Health Effects Short-term overexposure may cause irritation of eyes, nose and skin; breathlessness, irritability, euphoria, headache, dizziness or nausea. Long term effects may result in blood disorders such as leukemia and anemia.

Key Responsibilities

Manager or Designee

- Ensure personnel are aware of work that has the potential of exposure to benzene.
- Ensure individuals responsible for monitoring areas of exposure are properly trained.
- Ensure personnel receive documented medical surveillance exams.
- Ensure that emergency exams are performed if an overexposure or suspected overexposure occurs.

Supervisors

- Ensure employees have the appropriate personal protective equipment (PPE) and are properly trained in its use and care.
- Ensure employees comply with the benzene control program.

Safety Manager

- In coordination with the Manager, develop and implement project/task specific benzene control procedures prior to the start of activities that may include exposure to benzene.
- Coordinate monitoring activities, ensuring monitoring equipment is in proper working order and, as necessary, modifying the benzene control procedures to reflect exposure monitoring data.
- Maintain the benzene control program, notify management of any regulatory changes and ensure compliance with regulatory, client and corporate requirements.
- Coordinate training activities.
- Coordinate the medical surveillance program, including maintenance of medical records and administration of exams.
- Ensure fire extinguishers shall always be readily available where benzene is used/stored. Benzene liquid is
 highly flammable and vapors may form explosive mixtures in air. Fire extinguishers must be readily
 available in areas where benzene is used or stored.

Employees

- Comply with the benzene control program.
- Know where benzene is used at ALTA CONSTRUCTION, INC. or client facilities and follow any of additional plant safety rules required by the client.
- Comply with the medical surveillance program and attend examinations as required.
- Maintain respiratory protection equipment in good working order and notify the supervisor or Safety Representative of any problems prior to starting work
- Review material safety data sheets or consult with the supervisor to identify any container with benzene containing material.
- Not smoke in prohibited areas where benzene is present.
- Report exposures resulting in any symptoms immediately.

Training

Employees of Alta Construction will receive information and training at time of initial assignment in a benzene area. If exposures are above the action level, employees will receive information and training annually.

Procedure

Permissible Exposure Limits

The time-weighted average limit (TWA) for benzene is:

- 8-hour TWA 1 ppm
- 12-hour TWA 0.67 ppm

The short-term exposure limit (STEL) for benzene is 5 ppm.

Regulated Areas

- ALTA CONSTRUCTION, INC. shall establish regulated areas wherever airborne concentration of benzene exceeds or can reasonably be expected to exceed the PEL or STEL.
- ALTA CONSTRUCTION, INC. will control access to regulated areas and limit access to authorized personnel.
- Safety precautions such as prohibition of smoking in areas where benzene is used/stored shall be taken.
 Smoking is prohibited in areas where benzene is used or stored. The following signage shall be posted in all regulated areas when the potential exists for benzene vapors to be in excess of the PEL:

DANGER – BENZENE REGULATED AREA CANCER CAUSING AGENT FLAMMABLE – NO SMOKING AUTHORIZED PERSONNEL ONLY RESPRIATOR REQUIRED

Methods of Compliance

- The benzene control program shall be written and implemented to comply with OSHA regulation 29 CFR 1910.1028 (Benzene).
- ALTA CONSTRUCTION, INC. shall establish and implement a written program to reduce employee exposure
 to or below the PEL primarily by means of engineering and work practice controls to ensure compliance
 with the benzene control program and federal and state requirements.

Exposure Monitoring

Exposure monitoring shall be performed for the 8-hour and 12-hour TWAs or for the 15 minute STEL exposure when:

- Regulated areas are established
- An emergency occurs that could require a regulated area
- A change in the production, process, control equipment, personnel or work practices may result in new or additional exposure to benzene
- Cleanup of a spill, leak repair, or rupture occurs
- If the monitoring required reveals employee exposure at or above the action level but at or below the TWA, ALTA CONSTRUCTION, INC. shall repeat the monitoring for each employee at least every year.
- If the initial monitoring reveals employee exposure to be below the action level ALTA CONSTRUCTION, INC. may discontinue the monitoring.
- If the monitoring reveals that employee exposures, as indicated by at least two consecutive measurements taken at least 7 days apart, are below the action level ALTA CONSTRUCTION, INC. may discontinue to monitor.
- Direct reading detection instruments (Drager CMS is recommended) will be used where benzene vapors may be present in work areas not previously monitored.
- Personal monitoring will be performed by use of vapor monitoring badges following manufacturer requirements. All samples shall be analyzed at an AIHA (American Industrial Hygiene Association) certified laboratory.

Medical Surveillance

- Baseline and annual medical exams shall be provided to employees that may work or are anticipated to
 participate in operations more than 10 times per year or may work in areas where benzene exposures may
 exceed the PEL over 30 days per year.
- ALTA CONSTRUCTION, INC. shall make available a medical surveillance program for employees who are or
 may be exposed to benzene at or above the action level 30 or more days per year; for employees who are
 or may be exposed to benzene at or above the PELs 10 or more days per year; for employees who have
 been exposed to more than 10 ppm of benzene for 30 or more days in a year prior to the effective date of
 the standard when employed by their current employer.
- Notification of monitoring results shall be provided to employees in writing within 15 working days of receipt of results.

Personal Protective Equipment

- PPE will be selected on the basis of its ability to prevent absorption, inhalation and ingestion.
- PPE will reflect the needs of the employee based on work conditions, amount and duration of exposure
 and other known environmental factors but shall contain as a minimum; boots, proper eye protection,
 gloves, sleeves, aprons and others as determined.
- PPE shall be provided and worn when appropriate to prevent eye contact and limit dermal exposure to liquid benzene. PPE must meet the requirements of 29 CFR 1910.133 and provided at no cost to the employees.

Respiratory Protection

- A respiratory protection program shall be established in accordance with 29 CFR 1910.134. Respiratory protection is required:
 - o During the time period necessary to implement engineering controls or work practices.
 - When engineering and work practices are not feasible.
 - o In emergencies.

Approved respirators shall be selected according to airborne concentrations of benzene or condition of use.

- 0 to 0.67 ppm no respirator required
- 0.67 to 6.7 ppm half-mask respirator with OV cartridges
- 6.7 to 33 ppm full-face respirator with OV cartridges
- Greater than 33 ppm Due to the ALTA CONSTRUCTION, INC. policy of not permitting SCBA no employee shall enter a space containing more than 33 ppm.

Recordkeeping

- Medical surveillance records shall be maintained for 30 years after termination of employment
- Exposure monitoring records shall be maintained for 30 years after completion of the project
- Exposure and medical monitoring records shall be made available to affected employees or their representatives and to OSHA upon request

Communication of Benzene Hazards

- Signs and labels shall be posted at entrances of regulated areas
- The benzene control program shall be updated by the ALTA CONSTRUCTION, INC. Safety Manager
- Project site specific contingency and emergency procedures shall be updated by the Safety Manager and made available to project staff prior to beginning work at the specific site.

BLOODBORNE PATHOGENS

Purpose

The purpose of this plan is to establish a program and procedures for employee protection from blood borne pathogens at Alta Construction, Inc.

This plan supports compliance with Occupational Safety and Health Administration 29 CFR 1910.1030 on blood borne pathogens.

This plan applies to all company employees.

Definitions

- **A.** Blood borne Pathogens: Microorganisms that are present in human blood and body fluids and can cause diseases in humans. These pathogens include Hepatitis B Virus (HBV), Hepatitis C Virus (HCV) and Human Immunodeficiency Virus (HIV).
- **B.** Exposure Incident: A situation in which an employee has contact with blood or other potentially infectious materials as a result of his or her duties. This contact includes specific eye, mouth, other mucous membrane, nonintact skin or parenteral contact.
- C. Nonintact Skin: Skin that has cuts, abrasions or other openings through which blood borne pathogens can enter the bloodstream.
- **D. Occupational Exposure:** Reasonably anticipated employee contact with blood or other potentially infectious materials that may result from performing an employee's duties. This contact includes specific eye, mouth, other mucous membrane, nonintact skin or parenteral contact.
- **E. Source Individual:** Any individual, living or dead, whose blood or other potentially infectious materials may be a source of occupational exposure to an employee.
- **F.** Universal Precautions: An approach to infection control, in which all human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV, HCV and other blood borne pathogens.

Responsibilities

A. The Program Administrator: Thomas Hickman/Micha Lamoreaux,

These people are responsible for these tasks:

- a. Issuing and administering this plan and making sure that it satisfies the requirements of all applicable federal, state and local blood borne pathogens regulations
- b. Identifying which employees are likely to be exposed to blood borne pathogens
- c. Developing procedures for post exposure incidents
- d. Maintaining medical records of exposure incidents, training records and hepatitis vaccinations
- e. Completing exposure incident reports and notifying affected individuals
- f. Evaluating and updating the program annually
- g. Training employees annually

B. First Aid Providers: Paul Koch, Brian Barclay

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people are responsible for these tasks:

- a. Using Universal Precautions in all situations that involve exposure to blood and other body fluids
- b. Informing the program administrator of all exposure incidents

Program Activities

A. Determination Of Exposure

- a. A list will be made of all job classifications that have the potential for exposure to blood borne pathogens.
- b. Specific tasks and procedures will be listed when only some employees in a job classification have the potential to be occupationally exposed.

B. Personal Protective Equipment (PPE)

- a. Employees will be provided with PPE at no cost.
- b. PPE will be removed before leaving the work area or after a garment becomes contaminated.
- c. Used PPE will be placed in designated containers.
- d. Gloves will be worn when the employee may have contact with blood or other potentially infectious materials.
- e. Gloves will be replaced if torn, punctured or contaminated.
- f. Utility gloves will be decontaminated for reuse if they are not torn or cracked.
- g. Decontaminated disposable gloves will never be reused.

- h. Appropriate face and eye protection will be worn when splashes, sprays, spatters or droplets of blood or other potentially infectious materials pose a hazard to the eyes, nose or mouth.
- i. Appropriate protective body covering will be worn when occupational exposure is anticipated.

C. Housekeeping

- a. All equipment and work surfaces that have been contaminated with blood or other potentially infectious materials will be cleaned and decontaminated with an appropriate disinfectant.
- b. Tongs, forceps or a brush and a dust pan will always be used to pick up contaminated broken glass.
- c. Handwashing facilities are readily available at all work locations or antiseptic solutions/ towelettes will be available for use
- d. All infectious waste will be placed in red-colored plastic bags for disposal. Contaminated sharps will be discarded in containers that are closeable and puncture resistant. The containers will then be discarded into red-colored plastic bags.
- e. All regulated waste will be discarded according to federal, state and local regulations.

D. Labeling

a. All infectious waste containers will be labeled with a biohazard symbol and the word biohazard.

E. HBV Pre-Exposure Program

- a. The Hepatitis B vaccine and vaccination series will be offered within 10 working days of initial assignment to employees who have occupational exposure.
- b. The vaccine and vaccinations, as well as all medical evaluations and follow-up, will be made available to employees during work hours at no cost.
- Vaccinations will be administered according to current recommendations of the U.S. Public Health Service.
- d. Each employee who declines the vaccination will sign a declination form. (The vaccination will still be available to the employee at a later date and at no cost if he or she continues to have the potential for exposure in the workplace.)

F. HBV Post exposure Program

- a. Company post exposure procedures will be followed for any employee who is not initially identified as occupationally exposed but who voluntarily or inadvertently becomes exposed in the workplace.
- b. The HBV vaccine will be administered within 24 hours of any reported exposure incident.

G. Exposure Incident Procedure

- a. The routes of exposure and how exposure occurred will be documented.
- b. The source individual will be identified and documented.
- c. If consent is given, the source individual's blood will be tested and documented as soon as possible to determine HIV, HBV, and HCV infectivity.
- d. The exposed employee will be provided with the source individual's test results and information about applicable laws and regulations concerning source identity.
- e. After consent is give, the exposed employee's blood will be tested for HIV, HBV, and HCV serological status.
- f. If the employee does not give consent for HIV serological testing the baseline blood sample will be preserved for at least 90 days.
- g. Recommendations by the U.S. Public Health Service will be followed.
- h. The health care provider who is responsible for administering the vaccine and post exposure evaluation will be given a copy of the OSHA standard.
- i. After an exposure incident occurs, the health care provider will receive a description of the exposed employee's job duties relevant to the exposure incident, documentation of the route of exposure and circumstances of exposure, results of the source individual's blood tests and all relevant employee medical record, including vaccination status.
- j. The employee will be provided with a copy of the health care provider's written opinion within 15 days after the evaluation.

H. Training

After the first initial training employees will be trained annually on the requirements of the OSHA standard, symptoms of blood borne diseases, ways in which blood borne pathogens are transmitted, how to recognize tasks that might result in occupational exposure and what measures are provided by the company's Written Exposure Control Plan.

Recordkeeping

A. Exposure Determination Recordkeeping

To ensure that an employer is in compliance with the OSHA requirement for exposure determination, Exposure Determination Form I and Form II must be completed and maintained with the written program.

B. Exposure Incident Recordkeeping

These records must be kept for all individual employees who are involved in exposure incidents. These records must be kept in employees' individual files for the length of their employment plus 30 years and must be kept confidential. These forms include the following:

- Additional Recordkeeping: These forms document equipment selection and evaluation information as well as annual evaluation of the program.
- Training Recordkeeping: Training records must be kept on file for a minimum of 3 years.

COMPRESSED AIR

Purpose:

The purpose of this program is to ensure the safe use of compressed air and related equipment requirements.

Scope

This program covers all employees and contractors who handle and/or use compressed air.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper handling, storage and use requirements for compressed air.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.

Employees

• Shall follow all requirements regarding the safe handling and use of compressed air and related equipment.

Procedure

Hazards of Using Compressed Air

Compressed air is extremely forceful. Depending on its pressure, compressed air can dislodge particles. These particles are a danger since they can enter eyes or abrade skin. There have also been reports of hearing damage caused by the pressure of compressed air and by its sound.

Compressed air itself is also a serious hazard. On rare occasions, some of the compressed air can enter the blood stream through a break in the skin or through a body opening. The consequences of even a small quantity of air or other gas in the blood can quickly be fatal.

Horseplay has been a cause of some serious workplace accidents caused by individuals not aware of the hazards of compressed air or proper work procedures.

General Precautions

To prevent injury when working with compressed air:

- A compressed-air tool operator must wear eye protection and other appropriate personal protective equipment.
- Before operating an air hose, examine all connections to make sure they are tight and will not come loose under pressure. A loose air hose can make a dangerous bullwhip.
- Check the air hose carefully to make sure it is in good condition before opening the valve to let air into the hose; when the job if finished, turn off the valves on both the tool and the airline.
- Hold the nozzle when turning the air on or off.
- Before turning on the air pressure, make sure that dirt from machinery will not be blown onto other workers.
- Don't kink the hose to stop the airflow; always turn off the air and the control valve.
- Continuously check the condition of a compressed air tool and the air hose for damage or signs of failure.
- Never point a compressed air hose nozzle at any part of your body or another person.
- Never use compressed air for a practical joke.
- Never look into the "business end" of a compressed air tool.
- Never use compressed air for cleaning work clothes or machinery.
- Keep air hoses out of aisle ways where they can be damaged by traffic or be a tripping hazard.

Equipment Requirements

Every air receiver shall be equipped with an indicating pressure gauge. Every air receiver shall be equipped with an indicating pressure gauge, so located as to be readily visible, and with one or more spring-loaded safety valves. The total relieving capacity of such safety valves shall be such as to prevent pressure in the receiver from exceeding the maximum allowable working pressure of the receiver by more than 10 percent.

Safety valves are tested. All safety valves shall be tested frequently and at regular intervals to determine whether they are in good operating condition. Safety valves, indicating/controlling devices and other safety appliances need to be constructed, located and installed so they cannot be rendered inoperative by any means.

ALTA CONSTRUCTION, INC. requires frequent draining of the receiver. The drain valve on air receivers shall be opened and the receiver completely drained frequently and at such intervals as to prevent the accumulation of excessive amounts of liquid in the receiver.

Using Compressed Air for Cleaning

ALTA CONSTRUCTION, INC. has specific requirements to prohibit employees from using compressed air for cleaning unless the pressure is reduced to less than 30 p.s.i. Compressed air shall not be used for cleaning purposes except where the pressure is reduced to less than 30 p.s.i. and effective chip guarding and personal protective equipment is implemented.

Inspection of Compressed Air Cylinders

Compressed air cylinders must be visually inspected. ALTA CONSTRUCTION, INC. shall determine that compressed gas cylinders under their control are in a safe condition to the extent that this can be determined by visual inspection. These visual inspections shall be conducted as prescribed in the Hazardous Materials Regulations, as they pertain to the type of the compressed cylinders under ALTA CONSTRUCTION, INC. control.

COMPRESSED GAS CYLINDERS

Purpose:

The purpose of this program is to prevent injury from failing or failure of compressed gas cylinders and to establish requirements for handling, lifting and storing compressed gas cylinders safely.

Scope

This program covers all employees and contractors who handle, transport and/or use compressed gas cylinders.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper handling, storage and use requirements for compressed gas cylinders.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.

Employees

Shall follow all requirements regarding the safe handling, storage and use of compressed gas cylinders.

Procedure

General

Cylinders shall not be accepted, stored or used if evidence of denting, bulging, pitting, cuts, neck or valve damage is observed. If damage is observed:

- The cylinder must be taken out of service.
- The cylinder's owner shall be notified to remove the cylinder from the premises.
- If owned, the cylinder shall be de-pressured and inspected as required by this program.
- Compressed gas cylinders, portable tanks, and cargo tanks shall have pressure relief valves installed and maintained.

Cylinder Identification

Gas identification shall be stenciled or stamped on the cylinder or a label used. No compressed gas cylinder shall be accepted for use that does not legibly identify its content by name.

Handling

Valve caps must be secured onto each cylinder before moving or storage.

Secure the cylinder in a blanket when being lifted by mechanical means. Slings, ropes or electromagnets are prohibited to be used for lifting compressed gas cylinders.

The preferred means to move compressed gas cylinders is with a cart, carrier or with a helper.

Compressed gas cylinders must not be allowed to strike each other.

When a cylinder cap cannot be removed by hand the cylinder shall be tagged "Do Not Use" and returned to the designated storage area for return to vendor.

Storing

All cylinders must be secured upright in a safe, dry, well-ventilated area that limits corrosion and deterioration.

- Cylinders must be secured by means that will prevent the cylinder from falling.
- When securing the cylinder, the restraints shall not be attached to electrical conduit or process piping.
- Cylinders may be stored outside but should be protected from the ground to prevent rusting. Cylinders may be stored in sun except in localities where extreme temperatures prevail or in cases of certain gases where suppliers recommendations shall be observed. If ice or snow accumulate on cylinder, thaw at room temperature or with water at a temperature not to exceed 125*F.

Empty and non-empty cylinders shall be stored separately. All stored cylinders shall be capped.

Oxygen cylinders must be stored a minimum of 20 feet from combustible gas cylinders or areas where there may be open flame or arcing. Cylinders may also be stored where the oxygen is separated from combustible gas cylinders by a 5 foot or higher wall with a fire resistance rating of 30 minutes.

Storage areas for full and empty cylinders must be designated and labeled. Cylinders should be stored in definitely assigned places away from elevators, stairs or gangways.

Use

Cylinders must be equipped with the correct regulators. Regulators and cylinder valves should be inspected for grease, oil, dirt and solvents. Only tools provided by the supplier should be used to open and close cylinder valves.

Never force or modify connections.

Only regulators and gauges shall be used within their designated ratings.

The use of a pressure-reducing regulator is required at the cylinder, unless the total system is designed for the maximum cylinder pressure.

Valves must be closed when cylinders are not in use.

Cylinders shall not be used as rollers or supports.

Cylinders shall not be placed where they can come in contact with electrical circuits.

Cylinders must be protected from sparks, slag or flame from welding, burning or cutting operations.

Empty cylinders must be returned to designated storage areas as soon as possible after use.

Employees must never use compressed gas to clean of clothing.

Inspection of Compressed Gas Cylinders

ALTA CONSTRUCTION, INC. shall determine that compressed gas cylinders under its control are in a safe condition to the extent that this can be determined by visual inspection. Visual and other inspections shall be conducted as prescribed in the Hazardous Materials Regulations of the Department of Transportation (49 CFR parts 171-179 and 14 CFR part 103). Where those regulations are not applicable, visual and other inspections shall be conducted in accordance with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962. Some elements include, but are not limited to:

- Hoses and connections should be inspected regularly for damage. Hoses should be stored in cool areas and protected from damage.
- These owned cylinders shall be visually inspected prior to charging, before each use and at least annually.
- All inspections and testing must be documented.

High Pressure Cylinders are those cylinders marked for service pressures of 900 psi and greater.

- High pressure cylinders shall be taken out of service and submitted for re-qualification testing when any of the following conditions are identified by visual inspection.
- Cuts, dings, gouges, dents bulges, pitting, neck damage or evidence of exposure to fire.
- The cylinders shall be inspected and retested according to the requirements stated in 49 CFR 180.205 and .209.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Low Pressure Cylinders are those cylinders marked for service pressures of less than 900 psi.

- Low pressure cylinders fall into two categories, those requiring requalification and those that do not require re-qualification.
- Low pressure cylinders that do not require re-qualification shall be taken out of service and condemned when any of the following conditions are identified during inspection:
- The tare weight of the cylinder is less than 90% of the stamped on weight of the cylinder.
- Observed pitting, dents, cuts, bulging, gouges or evidence of exposure to fire.
- Low pressure cylinders subject to re-qualification shall be taken out of service, inspected and retested when visual inspection identifies any of the following conditions; dents, bulges, pitting or neck damage.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Leaking Cylinders

Leaking cylinders should be moved promptly to an isolated, well-ventilated area, away from ignition sources. Soapy water should be used to detect leaks. If the leak is at the junction of the cylinder valve and cylinder, do not try to repair it. Contact the supplier and ask for response instructions.

Transportation

Cylinders must be transported in a vertical secured position using a cylinder basket or cart and must not be rolled. Regulators should be removed and cylinders capped before movement. Cylinders should not be dropped or permitted to strike violently and protective caps are not used to lift cylinders.

Empty Cylinder Marking

Cylinders should be marked as "MT" and dated when empty. Never mix gases in a cylinder and only professionals should refill cylinders. Empty cylinders must be handled as carefully as when filled.

Engineering Controls

Engineering controls such as emergency shutoff switches, gas cabinets and flow restrictors should be used wherever possible to control hazards. Emergency eyewash facilities should be present where corrosive gases or materials are used.

CRANES

Introduction

Cranes, hoists and slings pose a serious safety hazard if not used properly. It is the policy of Alta Construction, Inc. to ensure employees are trained on the hazards of using cranes, hoists and slings and also to ensure that such equipment is safely maintained. Applicable References: OSHA 29 CFR 1910.180, 1926.251, 1926.550; API12D

Purpose & Scope

This program applies to all employees at Alta Construction, Inc.

This program is intended to provide Alta Construction, Inc. personnel with a guideline for the safe operation, use and inspection of mobile cranes and hoists.

This policy applies to wheel mounted cranes of both truck and self-propelled wheel type, and any variations thereof that retain the same fundamental characteristics used at company controlled work locations where company employees are performing work.

Definitions

Accessory – A secondary part or assembly of parts which contributes to the overall function and usefulness of a machine.

Axis of Rotation – The vertical axis around which the crane superstructure rotates.

Base – The traveling base or carrier on which the rotating superstructure is mounted such as a car. Truck, crawlers, or wheel platform.

Boom Angle – The angle between the horizontal and longitudinal centerline is a straight line between the boom foot pin (heel pin) centerline and boom point sheave pin centerline.

Boom Hoist – A hoist drum and rope reeving system used to raise and lower the boom. The rope system may be all live reeving or a combination of live reeving and pendants.

Boom – Member hinged to the front of the rotating superstructure with the outer end supported by ropes leading to a gantry or A-frame and used for supporting the hoisting tackle.

Boom Stop – A device used to limit the angle of the boom at the highest position.

Brake – A device used for retarding or stopping motion by friction or power means.

Cab – A housing which covers the rotating superstructure machinery and/or operator's station. On truck-crane trucks a separate cab covers the driver's station.

Clutch – A friction, electromagnetic, hydraulic, pneumatic, or positive mechanical device for engagement or disengagement of power.

Counterweight – A weight used to supplement the weight of the machine in providing stability for lifting working loads

Crane Safe Work Permit – The permit issued by the Site Supervisor or Crane Competent Person at the job site to the crane operator before any mobile hoisting work is performed.

Critical Lift – A lift where:

- The load exceeds 80% of the crane's capacity.
- Weight of the lift exceeds 50% of the load chart rating of the equipment being used and the lift is over power lines, process equipment, piping, or personnel are being lifted.
- Two booms are required.
- Poles or derricks have been erected.
- Personnel are being lifted.
- Crane is traveling with load.
- Any lift in a Critical Lift Area.

Designated – Means selected or assigned by Alta Construction, Inc. or a representative of Alta Construction, Inc. as being qualified to perform specific duties

Drum – Cylindrical members around which ropes are wound for raising and lowering the load or boom *Dynamic* – Means loads introduced into the machine or its components by forces in motion for hoisting and lowering loads.

Gantry – Structural frame, extending above the superstructure, to which the boom support ropes are reeved. Jib – An extension attached to the boom point to provide added boom length for lifting specified loads. The jib may be in line with the boom or offset to various angles

Load (working) – Means the external load, in pound, applied to the crane, including the weight of load-attaching equipment such as load blocks, shackles, and slings.

Load block (lower) – Means the assembly of hook or shackle, swivel, sheaves, pins, and frame suspended by the hoisting ropes.

Load block (upper) – Means the assembly of hook or shackle, swivel, sheaves, pins, and frame suspended from the boom point.

Load hoist – A hoist drum and rope reeving system.

Load Ratings - Crane ratings in pounds established by the manufacturer.

Locomotive Crane – Consists of a rotating superstructure with power-plant, operating machinery and boom, mounted on a base or car equipped for travel on railroad track. It may be self-propelled or propelled by an outside source. Mobile Hoisting Equipment – Conventional rigid boom cranes, hydraulic cranes, and flex lifts.

Outriggers – Extendable or fixed metal arms, attached to the mounting base, which rest on supports at the outer ends.

Reeving – A rope system in which the rope travels around drums and sheaves.

Rigging – Any cables, chokes, slings, hooks, beams, spreaders, or other device used to attach or lift the load *Rope* – Refers to a wire rope unless otherwise specified.

Side Loading – A load applied at an angle to the vertical plane of the boom

Superstructure – The rotating upper frame structure of the machine and the operating machinery mounted thereon Swing – Means the rotation of the superstructure for movement of loads in a horizontal direction about the axis of rotation.

Swing Mechanism The machinery involved in providing rotation of the superstructure.

Tackle – Assembly of ropes and sheaves arranged for hoisting and pulling.

Truck Crane – Consists of a rotating superstructure with power plant, operating machinery and boom, mounted on an automotive truck equipped with a power plant for travel.

Wheel Mounted Crane – Consists of a rotating superstructure with power plant, operating machinery and boom, mounted on a base or platform equipped with axles and rubber-tired wheels for travel. The base is usually propelled by the engine in the superstructure, but it may be equipped with a separate engine controlled from the superstructure. Whipline – A separate hoist rope system of lighter load capacity and higher speed than provided by the main hoist. Winch Head – A power driven spool for handling of loads by means of friction between fiber or wire rope and spool.

Responsibilities

Site Supervisor: The Site Supervisor is responsible for assuring that

- Employees know, understand, and comply with the requirements of this policy.
- Employees are trained in the procedures and use of equipment they are to use to complete the job.
- Each crane is on a regular (daily, monthly, annual) inspection schedule.
- Proofs of regular inspections using the checklist in this policy are available.
- Rental or leased cranes have a valid annual certification sticker or other documents prior to the use of the
 cranes
- Competent, qualified operators are used when lifting and directing the assembly/disassembly of equipment.
- A Crane Safe Work Permit is issued for the following:
 - o All lifts with cranes having a capacity greater than 10 tons.
 - o All critical lifts.
- Joint responsibility with the crane operator for the safe operation of the crane(s) and the safety of the lift is maintained.
- Failure to comply with this policy will result in disciplinary action, up to and including discharge.

Crane Operators: The Crane operator is responsible for:

- Knowing, understanding, and complying with this policy.
- Inspecting cranes on a daily basis und reporting defects noted during these inspections.
- Reporting any unsafe conditions to supervision.
- Knowing the weight of loads PRIOR to lifting.
- Knowing the wind speed PRIOR to lifting.
- Performing a daily inspection using the Daily Operators Inspection Report at the beginning of each day's
 work PRIOR to the crane use. Any deficiencies that affect the safe operations of the crane shall be repaired
 PRIOR to use. Each daily inspection report shall remain with the operator during the operation of the crane
 and turned in at the end of the work day.
- Perform a lifting job specific pre-task assessment using Operators Lift Pr-Task Safety Assessment for each
- Insure the load, rigging, procedures, and lifts are safe to use. The operator is responsible for the load and lift when the crane is connected to the load.

- When the rigging equipment is not in use, it should be removed from the work area to ensure the safety of workers at the site.
- Assume joint responsibility with the Site Supervisor for the safe operation of the crane(s) and the safety of
 the lift.
- Understand that failure to comply with this policy will result in disciplinary action, up to and including discharge.
- Operator must not divert attention away from lift(no headphones, phone calls etc.).

General Requirements

1. Pre-Lift

- a. Manufacturer's lifting procedures and methods shall be observed at all times.
- b. No modifications or additions which affect the capacity or safe operation of the equipment shall be made by Alta Construction, Inc. without the manufacturer's written approval. If such modifications or changes are made, the capacity, operation, and maintenance instruction plates, tags, or decals, shall be changed accordingly. In no case shall the original safety factor of the equipment be reduced.
- c. All cranes shall have a qualified competent operator.
- d. Inspect cranes when they arrive on site for mechanical integrity, load chart, operating manual and annual certification decal/sticker. The load rating chart will be substantial and durable, with clearly legible letters and figures. A copy of the manufacturer's load rating chart will be maintained in each crane, securely fixed to the crane cab in a location that is easily visible to the operator while seated at the control station. The load rating chart will not be removed from the crane cab.
- e. The crane operator must complete an Operator's Lift Pre-Task Assessment and Mobile Hoisting Safe Work Procedure PRIOR to lifting.
- f. Rated load capacities, recommended operating speeds, special hazard warnings, or instructions shall be in a conspicuous place on all equipment, as required, and shall be visible to the operator while at the control station.
- g. Inspect all rigging devices before use. Follow manufacturer's capacities and recommendations.
- h. Rigging will be done only by qualified personnel who have successfully completed rigger training as approved by Alta Construction, Inc., and who have the experience necessary to perform this work safely. Crane operators and inspectors will not perform rigging unless they are similarly trained and qualified.
- i. Obtain a Crane Safe Work Permit for all cranes with capacities of 10 tons or more and critical lifts.
- j. Work with lifts, cranes, or any hoisting equipment must be supervised at all times.
- k. A signal person must be provided it the point of operation is not in full view of the operator, if the view is obstructed when the equipment is traveling, or the operator or the person handling the load determines it is necessary due to site specific concerns.
- l. Wooden pads on outriggers will be used on all non-concrete surfaces. Mats will be used as needed.
- m. The rear of the rotating superstructure of a crane will be barricaded if personnel can have access and walk under load.
- n. Load block, headache ball, hooks, boom tip, and anti-2 block devices shall be marked with highly visible fluorescent orange paint.
- o. All jibs shall have positive stops to prevent their movement of more than 5 degrees above the straight line of the jib and boom on conventional type crane booms. The use of cable type belly slings does not constitute compliance with this rule.
- p. Equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met.
- q. The manufacturer's procedures and prohibitions must be complied with when assembling and disassembling equipment.
- r. The work zone shall be identified by demarcating boundaries such as flag and range limiting devices, or defining the work zone as 360 degrees around the equipment up to the maximum working radius. The hazard assessment must determine if any part of the equipment could get closer than 20 feet to a power line.

- s. Safety devices are required to be on all equipment and must be in proper working order before operations begin. If any of the devices are not in proper working order the equipment must be taken out of service and operations must not resume until the device is working properly again. Examples of safety devices may include: crane level indicator, boom stops, jib stops, foot pedal brake locks, horns, etc.
- t. Before initial use and after any altering the crane will be tested to make sure it is in compliance.

2. Lifting

- a. Lifting multiple load, "Christmas treeing", is prohibited.
- b. Whenever there is a safety concern, the operator must have the authority to stop and refuse to handle loads until a qualified person has determined that safety has been assured.
- c. Hand signals to crane operators shall be those prescribed by the applicable ANSI standard for the type of crane in use. An illustration of the signals shall be posted at the job site.
- d. All employees shall be kept clear of loads about to be lifted and of suspended loads.
- e. There shall be no sudden acceleration or deceleration of the moving load.
- f. Side loading of booms shall be limited to freely suspended loads. Cranes shall not be used for dragging loads sideways.
- g. No hoisting, lowering, swinging, or traveling shall be done while anyone is on the load or hook.
- h. On truck-mounted cranes, no loads shall be lifted over the front area except as approved by the crane manufacturer.
- i. The operator shall test the brakes each time a load approaching the rated load is handled by raising it a few inches and applying the brakes.
- j. Outriggers shall be used when the load to be handled at that particular radius exceeds the rated load without outriggers as given by the manufacturer for that crane. Where floats are used they shall be securely attached to the outriggers.
- k. Neither the load nor the boom shall be lowered below the point where less than 2 full wraps of rope remain on their respective drums.
- l. When two or more cranes are used to lift one load, one designated person shall be responsible for the operation. He/she shall be required to analyze the operation and instruct all personnel involved in the proper positioning, rigging of the load, and the movements to be made.
- m. In transit the following additional precautions shall be exercised:
 - i. The boom shall be carried in line with the direction of motion.
 - ii. The superstructure shall be secured against rotation, except when negotiating turns when there is an operator in the cab or the boom is supported on a dolly.
 - iii. The empty hook shall be lashed or otherwise restrained so that it cannot swing freely.
- n. Before traveling a crane with load, a designated person shall be responsible for determining and controlling safety. Decisions such as position of load, boom location, ground support, travel route and speed of movement shall be in accord with his determinations.
- o. A crane with or without load shall not be traveled with the boom so high that it may bounce back over the cab.
- p. When rotating the crane, sudden starts and stops shall be avoided. Rotational speed shall be such that the load does not swing out beyond the radii at which it can be controlled. A tag or restraint line shall be used when rotation of the load is hazardous.
- q. When a crane is to be operated at a fixed radius, the boom-hoist pawl or other positive locking device shall be engaged.
- r. Ropes shall not be handled on a winch head without the knowledge of the operator.
- s. While a winch head is being used, the operator shall be within convenient reach of the power unit control lever.
- t. The operator shall not be permitted to leave his position at the controls while the load is suspended.
- u. No person should be permitted to stand or pass under a load on the hook.
- v. If the load must remain suspended for any considerable length of time. The operator shall hold the drum from rotating in the lowering direction by activating the positive controllable means of the operator's station.
- w. The load rating will not be exceeded except when testing is being conducted.
- x. Hoisting of personnel platforms must be performed in a slow, controlled manner with no sudden movement.

Other Requirements

- a. Cranes shall not be operated without the full amount of any ballast or counterweight in place as specified by the manufacture, but truck cranes that have dropped the ballast or counterweight may be operated temporarily with special care and only for light loads without full ballast or counterweight in place. The ballast or counterweight in place specified by the manufacturer shall not be exceeded.
- b. Necessary clothing and personal belongings shall be stored in such a manner as to not interfere with access or operation.
- c. Tools, Oil cans, waste extra fuses, and other necessary articles shall be stored in the tool box, and shall not be permitted to lie loose in or about the cab.
- d. Refueling with small portable containers shall be done with an approved safety type can equipped with an automatic closing cap and flame arrester.
- e. Machines shall not be refueled with the engine running.
- f. When working in an enclosed area with a combustible engine, tests must be conducted and recorded to assure that the employees are not exposed to harmful gasses or oxygen deficient atmospheres.
- g. A carbon dioxide, dry chemical, or equivalent fire extinguisher shall be kept in the cab or vicinity of the crane.
- h. Operating and maintenance personnel shall be made familiar with the use and care of the fire extinguishers provided.
- i. Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or other moving parts or equipment shall be guarded if such parts are exposed to contact by employees, or otherwise create a hazard. Guarding shall meet the requirements of the American National Standards Institute B 15.1-1958 Rev., Safety Code for Mechanical Power Transmission Apparatus.
- j. Accessible areas within the swing radius of the rear of the rotating superstructure of the crane, either permanently or temporarily mounted, shall be barricaded in such a manner as to prevent an employee from being struck or crushed by the crane.
- k. The operator shall have access to procedures applicable to the operation of the equipment. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.
- l. All exhaust pipes shall be guarded or insulated in areas where contact by employees is possible in the performance of normal duties.
- m. Fall Protection will be used if employees are at risk of falling 6 feet or greater.

Crane maintenance, repairs and "out of service" procedures

- a. Move the crane to be repaired to a place where it will cause the least interference with other cranes and operations in the area.
- b. Set all controllers to the off position.
- c. Open the main or emergency switch and lock it in the open position.
- d. Place prominent warning or "out of Order" signs on the crane so that they are in plain sight of workers in the area.
- e. After repairs and adjustments are completed, replace all guards, reactivate all safety devices and remove maintenance equipment before operating the crane.
- f. A preventative maintenance schedule will be established that conforms to manufacturer recommendations.
- g. If equipment is taken out of service a tag must be placed in cab and equipment not be used. If a function of the equipment is taken out of service a tag must be placed in a conspicuous spot stating function is out of service and is not to be used.

Operations Near Overhead Electrical Lines

- a. For lines rated 50kV. Or below, minimum clearance between the lines and any part of the crane or load shall be 10 feet.
- b. For lines rated over 50kV., minimum clearance between the lines and any part of the crane or load shall be 10 feet plus 0.4 inch for each 1kV. Over 50kV., or twice the length of the line insulator, but never less than 10 feet.

- c. In transit with no load and boom lowered, the equipment clearance shall be a minimum of 4 feet for voltages less than 50kV., and 10 feet for voltages over 50kV., up to and including 345kV., and 16 feet for voltages up to and including 750kV.
- d. A person shall be designated to observe clearance of the equipment and give timely warning for all operations where it is difficult for the operator to maintain the desired clearance by visual means.
- e. Cage-type boom guards, insulating links, or proximity warning devices may be used on cranes, but the use of such devices shall not alter the requirements of any other regulation of this part even if such device is required by law or regulation.
- f. Any overhead wire shall be considered to be an energized line unless and until the person owning such line or the electrical utility authorities indicate that it is not an energized line and it has been visibly grounded.
- g. Prior to work near transmitter towers where an electrical charge can be induced in the equipment or materials being handled, the transmitter shall be de-energized or tests shall be made to determine if electrical charge is induced on the crane.
- h. The following precautions shall be taken when necessary to dissipate induced voltages:
 - i. The equipment shall be provided with an electrical ground directly to the upper rotating structure supporting the boom; and
 - ii. Ground jumper cables shall be attached to materials being handled by boom equipment when electrical charge is induced while working near energized transmitters. Crews shall be provided with nonconductive poles having large alligator clips or other similar protection to attach the ground cable to the load.
 - **iii.** Combustible and flammable materials shall be removed from the immediate area prior to operations.
- i. The rated load of the crane shall be plainly marked on each side of the crane, and if the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block, and this marking shall be clearly legible from the ground or floor.
- j. Bridge trucks shall be equipped with sweeps which extend below the top of the rail and project in front of the truck wheels.
- k. Except for floor-operated cranes, a gong or other effective audible warning signal shall be provided for each crane equipped with a power traveling mechanism.
- l. All overhead and gantry cranes in use shall meet the applicable requirements for design, construction, installation, testing, maintenance, inspection, and operations as prescribed in the ANSI B30.2.0-1967, Safety Code for Overhead and Gantry Cranes.
- m. Ensure the power lines have been deenergized and visibly grounded

Inspection Requirements

- a. The Crane Operator and the Crane Competent Person are responsible for performing inspections using Daily Operators Inspection Report Mobile Crane Operation, Monthly Hydraulic Crane Inspection Report and Monthly Inspection of Truck Cranes.
- b. Inspection of critical components of the crane shall be performed at least monthly. Components inspected shall include crane hooks and safety latches; brakes and braking components; and ropes.
- c. Inspection records shall be filed and maintained by the Safety Coordinator (Thomas Hickman/Micha Lamoreaux,) at Alta Construction, Inc. Such records shall include the inspection date, signature of the inspector, and identification of the component by serial number or other identifier. This certification record shall be maintained so that it is readily available for inspection and confirmation.
- d. A written record also shall be maintained of reports showing rated load test procedures and confirming the adequacy of repairs or alterations.
- e. Test loads shall not exceed 110 percent of the rated load at any selected working radius.
- f. If re-rating is required, crawler, truck and wheel mounted cranes shall be tested in accordance with SAE Recommended Practice, Crane Load Stability Test Code J765 (April 1961). Re-rating test report shall be readily available.
- g. No re-rating in excess of a crane's original load rating shall be performed unless the manufacturer or designated technician who is in charge of final assembly gives their approval in writing. Such written approval shall be maintained in a file by the Safety Coordinator (Thomas Hickman/Micha Lamoreaux,)
- h. A thorough annual inspection of the hoisting machinery shall be made by a competent person, or by a government or private agency recognized by the U.S. Department of Labor. Alta

- Construction, Inc. shall maintain a record of the dates and results of inspections and rated load tests for each hoisting machine and piece of equipment.
- i. Any defects found will be repaired by a qualified person before the crane is used.
- j. Before a crane is placed in service for use, rope components shall be inspected by a qualified person for defects, damage and deformities and at least monthly thereafter. Certification of this inspection shall be in writing and document the date of inspection; inspector's name and signature; and identification number of the rope component inspected.
- k. Hooks with deformation or cracks must be visually inspected daily and a monthly certification record that includes the date, signature of inspector, serial number or other identifier of inspected hook.
- 1. Hoist chains, including end connections, must be inspected for excessive wear, twist, distorted links and stretch beyond manufacturer recommendation. Must have a visual inspection daily and a monthly certification that includes date, signature of inspector and identifier od chains inspected.

Inspection of wire rope

Wire rope shall be taken out of service when any of the following conditions exist:

- a. In running ropes, 6 randomly distributed broken wires in 1 lay or 3 broken wires in one strand in one lay
- b. Wear of 1/3 the original diameter of outside individual wires.
- c. Kinking, crushing, bird caging, or any other damage resulting in distortion of the rope structure
- d. Evidence of any heat damage from any cause
- e. In standing ropes, more than 2 broken wires in 1 lay in sections beyond end connections or more than 1 broken wire at an end connection.

Heavy wear and/or broken wires may occur in sections that have contact with equalizer sheaves or other sheaves (where rope travel is limited) or with saddles. Particular care shall be taken to inspect ropes at these locations.

If rope has not been used for a month or longer this rope shall be given a thorough inspection before it is used.

This inspection shall be made by a designated person who is authorized by Alta Construction, Inc. This inspector shall examine rope for any kind of damage, deterioration or defect that might compromise the safety and specifications of the rope. Specific attention and care shall be given to the inspection of non-rotating rope.

Only this designated and authorized inspector shall give approval for use of this rope following satisfactory safety inspection.

A written record of the inspector's certification shall be maintained by the Safety Coordinator in a file and be readily available for review and confirmation. This certification shall include the inspection date, name and signature of

1. The Program Administrator: Thomas Hickman/Micha Lamoreaux,

- a. Must implement and administer the Aerial Lift Safety program.
- b. Review the Aerial Lift Safety program annually for compliance and effectiveness.
- c. Maintain written records of operator training on each model of aerial lift and the name of the trainer.
- d. Maintain written records of all inspections performed by the aerial lift owner, including the date any problems found, the date when fixed, and the name of the person performing the repairs.
- e. Maintain written records of the name and purchaser of each aerial lift.

2. Supervisors

- a. Coordinate employee training, and certify that all operators receive annual training.
- b. Ensure that only trained and qualified individuals use aerial lifts.
- c. Verify employee compliance with the principles and practices outlined in the Aerial Lift Safety Program.
- d. Provide specific operational training for each aerial lift.
- e. Observe the operation of aerial lifts, and correct unsafe practices.

3. All Employees

- a. Read the Aerial Lift Safety Program.
- b. Complete the Daily Pre-Use Inspection Checklist before operating any aerial lift.
- c. At least annually review the procedures outlined in this document.
- d. Observe the operation of the aerial lift, and report unsafe practices to your supervisor.

Training

Employees who are authorized to operate aerial lifts must receive training prior to engaging in their duties, and annually thereafter. The training is to ensure that the Aerial Lift safety Program is understood. The supervisor will also ensure that authorized aerial lift operators have acquired the necessary practical skills required for safe operation. Training is offered by certified trainers through Alta Construction, Inc. Certified trainers will perform an operational training with each employee to determine if operators have the knowledge, training, and skills necessary to use the aerial lift. Operational training will consist of a combination of general safety instruction, practical/operational training (demonstrations performed by the trainer, and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace. All operational training must be conducted under close supervision.

1. Initial Training

- a. Receive instruction on the intended purpose and function of each control.
- b. Prior to operating any Aerial Lift the trainee will read and understand the manufacturer's operating instruction(s) and aerial lift procedures, or receive training by a qualified person on the contents of the manufacturer's operating instruction(s) and users safety rules.
- Be informed of the Aerial Lift operating limitations and restrictions as defined by the manufacturer.
- d. Understand by reading or having a qualified person explain all decals, warnings and instructions displayed on the Aerial Lift.
- e. During operational training, trainees may operate an aerial lift only under the direct supervision of authorized trainers, and where such operation does not endanger the trainee or other employees.
- f. All training and evaluation must be completed before an operator is permitted to use an aerial lift without continual and close supervision.

2. Annual Training – must include at least the following

- a. Review of the Aerial Lift Inspection & Maintenance Record
- b. Review of Procedures
- c. Updated information on new Equipment.
- d. Review of Alta Construction, Inc.'s written program.

3. Training Records

Alta Construction, Inc. must maintain a record of all individual training, including:

- Subject of training
- Date of training
- Name of individual trained
- Name of authorized trainer
- Training records must maintained by Alta Construction, Inc. for a minimum of 3 years

DISCIPLINARY PROGRAM

Purpose

The purpose of this program is to establish a firm but fair disciplinary action policy to enforce the safety system. This program is applicable to all employees.

Responsibilities

- It is the responsibility of each and every person employed by Alta Construction, Inc. to work in a safe and efficient manner. The safety system provides guidelines and procedures to help insure that safe work practices are observed. In the event that any employee violates provisions of the Alta Construction, Inc. safety system or works in a manner that threatens his own health and safety or the health and safety of the employees around him, he will be subject to disciplinary action up to and including termination of employment.
- Management and supervisors are responsible for enforcing the safety system and for issuing disciplinary action as required by this section of the safety manual.
- Management and supervisors will physically inspect work areas to ensure compliance with the safety rules and policies.
- Alta Construction, Inc. is committed to safety. Management holds all supervisory staff responsible and accountable for safety within their respective areas.

Requirements

Safety is a core value and a condition of employment at Alta Construction, Inc. The following actions constitute a safety violation:

- Not following verbal or written safety procedures, guideline or rules of Alta Construction, Inc. or our clients
- Horse play, failure to wear required PPE, and or abuse of PPE
- Being under the influence of drugs or alcohol during work
- Bringing weapons on the job site
- Failure to report incidents or injuries
- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.

Procedure

- The first offense will result in a verbal warning. The employee is to be informed that he is being issued a verbal warning and informed why. Proper procedure will be discussed to clarify the situation and allow the employee to correct his behavior. The employee will receive additional training if necessary. The person making this verbal warning will inform the HR department that this warning has been issued so the office may make a written record of the warning.
- The second offense will result in a written warning using the standard form and additional training. Refer to the section of the safety program that was violated (when applicable). The employee receiving the warning has the right to submit a written rebuttal to the warning. The employee must sign the warning. The warning and any rebuttal will become a part of the employee's employment records.
- The third offense may result in the termination of the offending employee.

The above actions are to be placed against a sliding twelve month scale. If an employee receives a warning on January 1st and commits his third offense on or before December 31st of the same year, he may get terminated. The employee does not have to commit the same violation each time to receive further warnings. He could receive a verbal warning for smoking in a no smoking area on his first offense and get a written warning for his second offense which might be a forklift violation or for failing to use proper personal protective equipment. In the case of serious safety violations such as by-passing guarding or other unsafe activities that put the violator or other employees at serious risk of injury, the manager may move the violator directly to the second warning level. If the violator's actions put him or others at risk of death or dismemberment the management has the option to terminate the employee with no further warning.

DRIVING SAFETY

Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of ALTA CONSTRUCTION, INC. vehicle safety.

Key Responsibilities

ALTA CONSTRUCTION, INC. Safety Manager

• The designated Safety Manager is responsible for developing and maintaining the program and related procedures. These procedures are kept in the designated safety manager's office.

Site Manager

• Responsible for the implementation and maintenance of the program for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local workplace vehicle safety program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.
- Only authorized employees will drive a motor vehicle in the course and scope of work or operate an Alta Construction, Inc. owned vehicle.
- The driver of an ALTA CONSTRUCTION, INC. vehicle will have a valid and current license to operate the
 vehicle. Drivers will be appropriately assessed, licensed and trained to operate the vehicle they have been
 authorized to operate.
- Authorized drivers are not allowed to operate a motor vehicle while under the influence of alcohol, illegal
 drugs, certain medications, prescription or over-the counter medications that might impair their driving
 skills.

Vehicle and Transportation Related

Driving Safety

- No passengers shall be on trucks used to deliver goods.
- Backing is prohibited whenever practicable. Where backing is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.
- Drivers must have either a reversing alarm, use a spotter or walk around the truck/trailer prior to backing.
- Passenger compartments are to be free from loose objects that might endanger passengers in the event of an
 incident. Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to
 separate the storage area.
- Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer.
- Signs, stickers or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

<u>Reporting of Traffic Violations and Vehicle Accidents</u> - Authorized drivers will report any collision or traffic violation while driving on Alta Construction, Inc. duties to the appropriate personnel.

Safe Driver Behaviors/Practices:

- Authorized drivers will follow ALTA CONSTRUCTION, INC. Safe Driver Behaviors/Practices.
- Obey all federal and local driving laws or regulations as well as requirements of clients;
- Immediately report any restriction or change to their driving privileges to the supervisor.

- Driver and all passengers must wear seatbelts. Seatbelts shall be worn by all occupants at all times whenever a vehicle is in motion.
- Defensive drivers continually assess conditions and hazards and remain prepared for any challenge that
 may approach them.
- When speaking with a passenger, always keep your eyes on the road.
- Both hands on the wheel.
- Use of cell phones, hands-free cell phones, manipulating radios or other equipment which may cause distraction while driving any vehicle is prohibited. Vehicle must be safely parked prior to using a cell phone or 2-way radio.
- Drivers shall not exceed the posted speed limit.
- Drivers shall maintain a safe distance between other vehicles.
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving;
- Alcohol or illegal drugs are not allowed to be in a Alta Construction, Inc., client or leased vehicle at any time;

Drivers are to be prepared before leaving:

- Perform 360 walk around report new damage.
- Check windshield for cracks that could interfere with vision.
- Inspect for vehicle damage and immediately report any damage to the supervisor if not previously observed.
- Make sure dirt or snow is removed from lights on all sides of the vehicle.
- Brush or clean off snow or ice on all windows to ensure complete vision.
- Check fuel level to be certain the destination can be reached.
- Check to ensure the license plates and inspection tag on vehicle are current.
- Ensure that there is a first aid kit and inspected fire extinguisher in the Alta Construction, Inc. vehicle.
- Ensure driver is rested and alert for driving.
- Employees are not to perform repairs or maintenance other than routine fluid additions.

Vehicle Requirements

- Vehicles shall be maintained in safe working order.
- Vehicles are of the correct size and designed for intended use. The vehicle shall be fit for the purpose.
- Tires, including spares if full size, are to be of same type, profile and tread pattern, except when the vehicle or tire Manufacturer recommends a different type for certain axles.
- Tire type and pattern is to be recommended by the vehicle or tire manufacturer for use on the vehicle in the area of operation.
- Vehicles are to be fitted with a spare wheel and changing equipment to safely change a wheel, or a suitable alternative.
- All seats are to be fitted with headrests
- All light duty vehicles (including buses) are to be equipped with an adjustable left, right and central rear view mirrors
- Loads shall be secured and within the manufacturer and legal limits and shall not exceed the manufacturer's specifications and legal limits for the vehicle.
- All vehicles are to be equipped with a multipurpose fire extinguisher with a capacity of at least 0.9 kg/2 lb. The fire extinguisher shall be securely mounted on a bracket and located so that it is easily accessible in an emergency without becoming a hazard in case of an incident.
- All light vehicles shall be equipped with a securely stowed first aid kit.
- All drivers of light vehicles shall carry a high visibility jacket for use in case of emergency stops.
- All light duty vehicles carry a minimum of one collapsible hazard warning triangle.
- Rollover protection will be installed in any vehicle to address high risk environments. The rollover protection engineered will conform to recognized regulatory standard and industry preferred practices.
- All light equipment vehicles shall be outfitted with two red high-intensity lights located as high, as far apart, and as far back as practical, wired to the headlight switch, but also with an override switch, if permitted by local regulations.

Transportation

If workers are required to travel in a worker transportation vehicle ALTA CONSTRUCTION, INC. must ensure that reasonable measures are taken to evaluate road, weather and traffic conditions to ensure the safe transit of the workers.

The operator of a worker transportation vehicle must ensure that the worker transportation vehicle has been inspected by a qualified person before first use on a work shift.

Seated workers must wear seat belts while being transported in a vehicle equipped with seat belts.

A worker must not ride in a vehicle in a standing position, unless protected from being thrown off balance.

A worker must not ride in a vehicle with any part of the body outside the vehicle unless essential to the work process and then only if the worker is adequately restrained.

Materials, goods, tools or equipment carried in a portion or compartment of a vehicle in which workers are riding must be located and secured to prevent injury to the operator or workers.

Any enclosed portion or compartment of a vehicle in which workers are transported must have:

- effective ventilation, independent of doors, providing clean air,
- adequate lighting and means for heating and cooling,
- an effective means of communication between the operator and passengers, and
- more than one means of exit.

Traffic Control

ALTA CONSTRUCTION, INC. shall develop, in writing, and implement a traffic protection plan for its workers at a worksite if any of them may be exposed to a hazard from vehicular or pedestrian traffic that may endanger the safety of any worker. It shall include the following control measures:

- Effective means of traffic control shall be provided whenever the unregulated movement of vehicular traffic constitutes a hazard to workers.
- Traffic control shall include barricades and cones as the primary control and, where required, signs, flagmen or other techniques and devices made necessary by the prevailing circumstances.
- Operations or equipment, encroaching on the traveled way, shall be protected by barricades and cones as the primary control and, where required other effective devices.
- ALTA CONSTRUCTION, INC. must train workers in the traffic control safe work procedures.
- ALTA CONSTRUCTION, INC. will ensure that before a worker is designated as a flag person, the worker
 is trained in the safe work procedures for the safe control of traffic operations and wears the appropriate
 high visibility outer clothing and/or equipment.
- If a worker at a project on a highway may be endangered by vehicular traffic unrelated to the project, the project shall make use of as many measures as necessary to adequately protect the worker.
- A worker who is required to set up or remove traffic control measures on a roadway or a shoulder of a roadway shall be a competent worker, shall be equipped with the appropriate high visibility apparel, shall not perform any other work while setting up or removing the measures and shall be given adequate written and oral instructions in a language that he or she understands, with respect to setting up or removing the measures.

ATV Vehicles

If an ALTA CONSTRUCTION, INC. work site utilizes ATV vehicles then the following shall apply:

• If the manufacturer has not set limits for operation of the ATV on sloping ground, 5% is the maximum allowable slope unless ALTA CONSTRUCTION, INC. has developed and implemented written safe work procedures appropriate for any steeper slope on which the equipment is to be used.

- ALTA CONSTRUCTION, INC. must ensure that each ATV operator is properly licensed and trained in the safe operation of the vehicle. The training program for an ATV operator must cover:
 - o the operator's pre-trip inspection,
 - o use of personal protective apparel,
 - o operating skills according to the ATV manufacturer's instructions,
 - o basic mechanical requirements, and
 - o loading and unloading the vehicle, if this is a job requirement.
- An ATV operator and any passenger on an ATV must wear approved eye and hearing protection as required by local regulatory requirements and the ALTA CONSTRUCTION, INC. PPE Program. An ATV operator and any passenger on an ATV must wear clothing suitable for the environmental conditions and when necessary to protect against the hazards presented at the worksite, suitable gloves and clothing which covers the ankles and legs and the arms to the wrists and appropriate footwear.
- ALTA CONSTRUCTION, INC. requires that approved helmets shall be worn by the operator and passenger.
- Loading and unloading of an ATV onto or off a carrier vehicle must be done in a safe manner. If ramps are used when loading or unloading an ATV they must be placed at a suitable angle, be sufficiently wide and have a surface finish which provides an adequate grip for the ATV's tires.

ELECTRICAL SAFETY AWARENESS

Purpose & Scope

Electricity has long been recognized as a serious workplace hazard, exposing employees to such dangers as electrical shock, electrocution, fires and explosions

OSHA standards are designed to cover many electrical hazards in many different industries.

Most of OSHA's electrical standards are based on the National Electric Code and National Fire Protection Association Standards.

OSHA standards focus on the design and use of electrical equipment and systems.

The standards covers the exposed or operating elements of an electrical installation such as lighting, equipment, motors, machines appliances, switches, controls, and enclosures, requiring that they be constructed and installed to minimize workplace electrical dangers.

Since Alta Construction, Inc. has no permit-required confined spaces or equipment that required the use of an energy control program we will abide by the host employer's individual confined space and/or lockout/tagout program(s). Prior to commencing any work in which confined space entry and/or lockout/tagout is required, all Alta employees shall be trained in that company's confined space entry and/or lockout/tagout program. This information will be obtained from the host employer.

Responsibilities

Employer:

- Develop Electrical Safety program for Alta Construction, Inc. employees
- Make sure all equipment is properly maintained
- Make sure employees have proper training
- Control unauthorized access to electric utility rooms
- Keep access to electrical panels and control panels clear
- Do not store any equipment or materials in electric utility rooms or closets.

Employees:

- Follow all rules and procedures
- Use only approved electrical equipment and tools
- Make sure all covers & guards are over electrical circuits
- Immediately report any exposed wires, missing covers or broken plates equipment.
- Always use required PPE
- Avoid loose clothing and jewelry
- Follow all lockout/tagout procedures
- Avoid overload on circuits
- Inspecting all equipment, cords, switches and components prior to each use
- Read and follow all safety sign, symbols and barriers

Electric Shock

- Normally electricity travels in closed circuits, through a conductor. But sometimes a person's body an efficient conductor of electricity mistakenly becomes part of the electric circuit.
- This can cause an electrical shock. Shocks occur when a person's body completes the current path with:
 - o Both wires of an electric circuit;
 - One wire of an energized circuit and the ground;
 - O A metal part that accidentally becomes energized due, for example, to a break in its insulation; or
 - o Another "conductor" that is carrying a current.
- An electric shock can result in anything from a slight tingling sensation to immediate cardiac arrest. The severity depends on the following:
 - o The amount of current flowing through the body,
 - o The current's path through the body,
 - o The length of time the body remains in the circuit, and
 - The current's frequency.

The following chart shows the effects vs. ampere

painful shock 3 ma 10 ma muscle contraction "no-let-go" danger

30 ma lung paralysis – usually temporary 50 ma possible ventricular fibrillation. (Heart dysfunction, usually fatal)

100 ma to 4 amps certain ventricular fibrillation, fatal heart paralysis;

Over 4 amps severe burns, death

Electrical Hazards

- Caution Low voltage doesn't always mean low hazards
- Any amount of electricity can cause additional injuries, such as:

 - Internal bleeding 0
 - Destruction of tissue, nerves and muscles

Protection against electrical hazards:

- Most electrical accidents result from one of the following three factors:
 - Unsafe equipment or installation,
 - Unsafe environment, or
 - Unsafe work practices
- Some ways to prevent these accidents are through the use of insulation, guarding, grounding, electrical protective devices, and safe work practices.

Insulation

- Insulators such as glass, mica, rubber, or plastic used to coat metals and other conductors help stop or reduce the flow of electrical current.
- To be effective, the insulation must be suitable for the voltage used and conditions where it is being used.
- And must not be damaged
- Insulation on conductors is often color coded. Insulated equipment grounding conductors usually are either solid green or green with yellow stripes
- Insulation covering grounded conductors is generally white or gray. 0
- Ungrounded conductors, or "hotwires," often are black or red, although they may be any color other than green, white, or gray.

Grounding

- "Grounding" a tool or electrical system means intentionally creating a low-resistance path that connects to the earth. This prevents the buildup of voltages that could cause an electrical accident.
- Grounding is normally a secondary protective measure to protect against electric shock.
- It does not guarantee that you won't get a shock or be injured or killed by an electrical current.

Circuit protection device

- Circuit protection devices limit or stop the flow of current automatically in the event of a ground fault. Overload, or short circuit in the wiring system
- Examples of these devices are fuses, circuit breakers, ground-fault circuit interrupters
 - Fuses and circuit breakers open or break the circuit automatically when too much current flows through them.
 - Fuses and circuit breakers are designed to protect conductors and equipment.
 - Ground-fault circuit interrupters, or GFCIs, are used in wet locations, construction sites, and other high-risk areas.
 - GFCIs are devices that can interrupt the flow of electricity within as little as 1/40 of a second to prevent electrocution.
 - GFCIs compare the amount of current going into electric equipment with the amount of current returning from it along the circuit conductors. If the difference exceeds 5 milliampere, the device automatically shuts off the electric power.
 - GFCI's are designed to protect you from shock

Safe work practice

- Electrical accidents are largely preventable through safe work practices. Examples of these practices include the following:
 - De-energizing electric equipment before inspection or repair,
 - Keeping electric tools properly maintained,
 - Exercising caution when working near energized lines, and using appropriate protective equipment.

- Safe work practices shall be employed to prevent electric shock or other injuries resulting
 from either direct or indirect electrical contacts when work is performed near or on
 equipment or circuits which are or may be energized.
- Where live parts present an electrical hazard, employees may not perform housekeeping duties at such a distance that there is a possibility of contact unless adequate safeguards are provided. Employees may not use conductive cleaning supplies in proximity of energized parts.

Other forms of protection

- The best way to protect yourself when using electrical tools or machines is to establish a low-resistance path from the device's metallic case to the ground. This requires an equipment grounding conductor, a low-resistance wire that directs unwanted current directly to the ground. Cord and plug equipment with a three-prong plug is a common example of equipment incorporating this ground conductor.
- Another form of protection is to use listed or labeled portable tools and appliances protected by an
 approved system of double insulation or its equivalent. The tool must be marked distinctively to
 indicate that the tool or appliance uses an approved double insulation system.
- Employees who work directly with electricity should use the personal protective equipment required for the jobs they perform. This equipment may include rubber insulating gloves, hoods, sleeves, matting, blankets, line hose, and industrial protective helmets designed to reduce electric shock hazard.

• General Work Practices

- Only qualified employees are permitted to work on or repair electrical systems or equipment
- Outlets are always grounded
- Never overload any outlet, more than two plugs per double outlet may be an overload
- Read and follow all safety signs, symbols and barriers.
- Avoid working with electricity if you or the work area has been exposed to wet weather. If your work site is at all moist. Locking connectors provides safety
- Work shall not be performed on exposed energized parts of equipment or systems until the following conditions are met:
 - Responsible supervision has determined that the work is to be performed while the equipment or systems are energized.
 - Involved personnel have received instructions on the work techniques and hazards involved in working on energized equipment
 - Suitable personal protective equipment and safeguards (i.e. approved insulated gloves or insulated tools) are provided and used.
- O "Overhead lines." if work is to be performed near overhead lines, the lines shall be deenergized and grounded, or other protective measures shall be provided before work is started. If the lines are to be deenergized, arrangements shall be made with the person or organization that operates or controls the electric circuits involved to deenergize and ground them. If protective measures, such as guarding, isolating, or insulating, are provided, these precautions shall prevent employees from contacting such lines directly with any part of their body or indirectly through conductive materials, tools, or equipment.
- When an unqualified person is working in an elevated position near overhead lines, the location shall be such that the person and the longest conductive object he or she may contact cannot come closer to any unguarded, energized overhead line than the following distances:
 - For voltages to ground 50kV or below 10 feet (305 cm);
 - For voltages to ground over 50kV 10 feet (305 cm) plus 4 inches (10 cm) for every 10kV over 50kV.
- "Qualified persons." When a qualified person is working in the vicinity of overhead lines, whether
 in an elevated position or on the ground, the person may not approach or take any conductive
 object without an approved insulating handle closer to exposed energized parts than shown in
 Table below:

Voltage range (phase to phase) | Minimum approach distance 300V and less | Avoid Contact Over 300V, not over 750V | 1 ft. 0 in. (30.5 cm). Over 750V, not over 2kV | 1 ft. 6 in. (46 cm).

Alta Construction, Inc. employees only unqualified Personal.

- O Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines shall be operated so that a clearance of 10 ft. (305 cm) is maintained. If the voltage is higher than 50kV, the clearance shall be increased 4 in. (10 cm) for every 10kV over that voltage.
- o Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely
- o Portable ladders shall have non-conductive side rails.
- Conductive items of jewelry or clothing shall not be worn unless they are rendered non-conductive by covering, wrapping or other insulating means.

• Lockout/Tagout

- Referred to as LOTO
- o Blocks flow of energy from power source to the equipment
- o Provides means of warning (tag)
- A method of protecting workers
- LOTO Standard must be followed if:
 - An employee is required to remove or bypass a guard or other safety device
 - An employee is required to place any part of his/her body into machine's point of operation or a danger zone associated with a machine's operating cycle.
- Only properly trained and qualified workers may use Alta Construction, Inc. LOTO procedures.
 Under the procedures the qualified employee does the isolation of the circuits or equipment
- o All affected workers must be informed of the LOTO
- The qualified worker will follow Alta Construction, Inc. LOTO procedures:
 - Survey the Jobsite to identify all energy sources. Requires physical inspection, possibly in combination with a study of drawings and equipment manuals.
 - Locate and mark the disconnecting function. Categorize the identification details as to equipment supplied and energy type and magnitude, from material worked out beforehand in this LOTO program planning study.
 - A sign or sticker "LOCKOUT HERE" placed at the disconnecting means will help direct workers to correct lockout devices. In complicated operations, schematics of just the disconnecting means may need to be drawn up by the jobsite engineering department.
 - There are many different ways to lock out a piece of equipment. Alta Construction, Inc. commonly uses Locks.
 - Conductors and parts of electrical equipment that have been deenergized but not been locked or tagged out shall be treated as live parts.
- o Shutdown Procedures
 - Notify affected employees
 - Shut down equipment
 - Shut off energy source to affected equipment
 - Affix lock to each energy source controlling device
 - Relieve all stored energy from capacitor banks, springs, compressed air, hydraulics, steam, etc.
 - Verify isolation of energy has occurred by trying equipment
 - Do not attempt any work until process is completed!
- Testing Equipment During Lockout
 - Clear machine of tools and materials.
 - Remove employees from machine.
 - Remove LOTO devices and notify affected employees of removal.
- Restoring Equipment to Service
 - Remove all non-essential items.
 - Check equipment components, including guards and safety devices.
 - Repair or replace defective guards before removing lockouts.

- Remove each lockout device using the correct removal sequence.
- Make a visual check before restoring energy to ensure that everyone is physically clear of the equipment.
- O Testing Equipment During Lockout
 - Clear machine of tools and materials.
 - Remove employees from machine.
 - Remove LOTO devices and notify affected employees of removal.
 - Energize and proceed with testing/positioning.
 - De-energize all systems, notify affected employees and re-apply LOTO devices.
 - Continue with servicing/maintenance work.

• Training

- All Alta Construction, Inc. Employees will be trained at time of employment and annually thereafter in the Basic Electrical Safety Awareness
- Qualified Alta Construction, Inc. Employees will be refreshed annually in the Alta LOTO procedures.

Fall Protection

General Requirements

- Each employee on a walking or working surface with an unprotected side, edge or hole which is six (6) feet or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems or personal fall arrest systems.
- Each employee will be protected from falling into an excavation, pit, shaft or well by the use of guardrail systems, barricades, or person fall arrest systems when the hazards are not easily seen because of plant growth or other visual barrier or when the employee is required to work at the edge of the hazard.
- Each employee working above dangerous equipment shall be protected from falling into or onto the
 dangerous equipment by the use of guardrail systems, barricades, or personnel fall arrest systems or
 equipment guards.
- Alta Construction, Inc. will ensure that all employees are following OSHA requirements on the proper use
 of safety body harnesses, lanyards, lifelines and other fall protection equipment prior to use, and will
 provide initial and annual training. The training will be dated and require employees and instructors
 signature as well as determination from employer that training is adequate.
- Re-training will be required if there is a change in equipment, workplace or requirements.
- Alta Construction, Inc. does not utilize controlled access zones.
- All accidents/near misses will be investigated.

Work situations where fall protection is typically required includes the following:

- When working on suspended scaffolds.
- When work takes place adjacent to dangerous equipment or processes (e.g., open tanks, chemical baths, etc. Regardless of height)
- When accessing any rooftop
- On scaffolds or elevated walkways with incomplete decking or handrail.
- When using any type of ladder above 6 feet as a work platform. (Note: this does not apply when simply using a ladder to move or climb from one level to another.)
- When working from personnel platforms or man lifts.

Key Responsibilities

Site Supervisor, Foreman or Manager

- Verify that employees are properly trained in fall protection prior to working in areas requiring fall protection.
- Ensure that employees have appropriate fall protective devices, and equipment when working unprotected more than six (6) feet above the nearest working surface.
- Verify that, where they exist, pre-job JSA's properly identify fall hazards.
- Supervisor must put competent person in place to monitor employee safety. The competent
 person shall be able to recognize fall hazards, warn unaware employees of fall hazards or are
 acting in a unsafe manner. The competent person must be on same working surface and remain in
 visual contact with employees and stay close enough for verbal communication. Competent
 person shall not have other assignments that could interfere with monitoring process.

User of Fall Protection

- Understand all fall protection requirements as they apply to the job you are performing
- Use fall protective equipment in the manner for which it was designed
- Comply with the requirements of paragraph 3 of this standard.

Process

Selection of Safety Body Harnesses and Lanyards

- Only full body harness will be utilized and they must be rated for the employee's weight.
 Employees who exceed 250 pounds will be required to wear a harness that is rated heavy duty and designed for their weight.
- All fall protection equipment will meet ANSI requirements.
- Lanyards will be the shock absorbing type. A double or "Y" lanyard that allows for the 100% tie off is required.
- All components of fall protection equipment must be capable of withstanding 5,000 pounds breaking strength without cracking, breaking or resulting in permanent deformation.
- Buckles must hold securely without slippage or other failure.
- Lanyard length must limit a free fall distance to less than 6 feet.
- Lanyards should be secured whenever possible above the waist or overhead to minimize actual fall distance.
- Wire rope cannot be used for lanyards because it does not stretch, thus it does not have sufficient energy absorbing capability.
- Lanyards and lifelines shall be kept free of knots.
- Any lifeline, body harness or lanyard actually used to arrest a fall shall be immediately removed from service and discarded or recertified by the manufacturer.
- Lanyards shall always be manufacturer assembled and never "home made."

Fall Protection Planning and Inspection

- The user will be required to properly inspect and document the fall protection system they are using on a daily basis.
- The designated competent person will be responsible to assist supervision with the development of the appropriate fall protection requirements and plan for the specific jobsite or facility. The competent person will have the final decision on fall protection requirements as outlined in the applicable regulations.
- The Site Supervisor or manager will conduct periodic inspections of the fall protection equipment and will keep records of the inspections. All damaged equipment will be removed from service and sent to the safety department.

Horizontal and Vertical Lifelines for Anchor Point Connections

- Horizontal lifelines shall be designed, installed, and used under the supervision of a qualified person, as part of a complete fall arrest system.
- Each horizontal lifeline shall have a minimum breaking strength of 5000 pounds and each employee will be attached to a separate lifeline.

Rescue Considerations

Supervisors shall provide for the prompt rescue of employees in the event of a fall, or, shall assure the self-rescue capability of employees. The availability of rescue personnel, ladders, or other rescue equipment should be evaluated during the job planning stage.

Investigation:

If an employee falls or has a related serious incident, the employer shall investigate the circumstances and determine if the fall protection plan needs to be changed. If changes are deemed necessary, employer will implement them to prevent similar incidents.

Fatigue Management

Purpose

To ensure our employees recognize to effect of fatigue as related to safely being able to perform work and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations.

Scope

This program applies to all ALTA CONSTRUCTION, INC. projects and operations.

Policy

The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:

- Employees must be in a fit state to undertake work
- Employees must be fit to complete work
- Employees must take minimum periods of rest to safely perform their work

These principles will be managed through:

- The appropriate planning of work tasks, including driving, vehicle and equipment maintenance, loading and unloading and other job related duties and processes
- Providing appropriate equipment to help reduce stress and fatigue
- Regular medical checkups and monitoring of health issues as required by legislation
- The provision of appropriate sleeping accommodations where required
- Ongoing training and awareness of employee health and fatigue issues

Roles and Responsibilities

The following addresses the roles and responsibilities of workers to report tiredness/fatigue to supervision and that supervision take appropriate action to assist the worker.

ALTA CONSTRUCTION, INC. Management

Management accepts responsibility for the implementation of this fatigue management policy.

Site Manager

• Responsible for the implementation and maintenance of this program for their site and ensuring all assets are made available for compliance with the program.

Roles and Responsibilities Employees in Safety Critical Positions

- Employees must present in a fit state free from alcohol and drugs;
- Employees must not chronically use over-the-counter, prescription drugs and any other product which may affect an employee's ability to perform their work safely, including fatigue that sets in after the effects of the drug wear off.
- Employees shall report tiredness/fatigue and lack of mental acuity to supervision and supervisory personnel shall make safety critical decisions and take appropriate actions to prevent loss including replacement of tired employees, changing schedules or forcing work stoppages.
- Employees need to be rested prior to starting work.
- Employees need to monitor their own performance and take regular periods of rest to avoid continuing work when tired.

Work Hour Limitations and Rest Breaks to Control Fatigue and Increase Mental Fitness

ALTA CONSTRUCTION, INC. has set the following procedures limiting work hours and controlling job rotation schedules, also known as staff/work balance, to help control worker fatigue. ALTA CONSTRUCTION, INC. will set work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and increase mental fitness in an effort to control employee turnover and absenteeism.

- 1. Every Employee shall have necessary work breaks in order to avoid fatigue. These scheduled breaks will apply to both driving and on site hours. The following shall be a minimum:
 - 15 Minutes each 2.5 hours
 - 30 Minutes after 5 Hours
 - 30 Minutes after 10 Hours
- 2. No Workers shall work more than:
 - 12 hours per day
 - 24 Days Continuous
- 3. Unfamiliar or irregular work should be avoided.
- 4. Chairs will be provided for workers to site periodically and ALTA CONSTRUCTION, INC. will provide periodic rest breaks for personnel.

Use of Ergonomic Friendly Equipment

Ergonomic equipment will be used to improve workstation conditions such as anti-fatigue mats for standing, lift assist devices for repetitive lifting, proper lighting and controls of temperature and other ergonomic devices as deemed appropriate. Equipment to be used will be determined in the work task analysis.

Analysis of Work Tasks to Control Fatigue

Work tasks to control fatigue must be analyzed and evaluated periodically. ALTA CONSTRUCTION, INC. will make any necessary changes to equipment, training or procedures based on the evaluation.

Incident Analysis

If there is an incident there shall be an initial identification/assessment of evidence. Initial identification of evidence immediately following the incident might include a listing of people, equipment, materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc. and physical factors such as fatigue, age and medical condition.

Initial and Annual Training for Workers on Fatigue and Controlling Fatigue

ALTA CONSTRUCTION, INC. is committed to ensuring that all employees are competent to perform their tasks including:

- Fatigue management and health issues.
- ALTA CONSTRUCTION, INC. must provide initial and annual training on how to recognize fatigue, how to control fatigue through appropriate work and personal habits and reporting of fatigue to supervision.

A record of individual fatigues training and competency will be maintained.

Fire Extinguisher

Purpose

The purpose of this program is to establish procedures for the use of fire extinguishers at Alta Construction. This program supports compliance with the Occupational Safety and health Administration Fire Extinguisher Standard as found in 29 CFR 1919.157. This program applies to all company employees who have been authorized to operate fire extinguishers for incipient stage fires.

Definitions

Extinguisher Rating: The numerical rating given to an extinguisher which indicates the extinguishing potential of the unit based on standardized tests.

Incipient Stage Fire: A fire in the initial or beginning stage which can be controlled or extinguished by portable fire extinguishers, standpipes or small hose systems, and without the need for protective clothing or breathing apparatus. *Inspection:* A visual check of fire extinguishers to ensure that they are in place, charged and ready for use in the event of a fire.

Responsibilities

The Program Administrator Micha Lamoreaux Office Manager

This person is responsible for:

- Issuing and administering this program and making sure that the program satisfies the requirements of all applicable Federal, State or Local fire extinguisher requirements.
- Providing initial and annual training to employees on fire extinguisher operation.
- Providing initial and annual training to employees on fire extinguisher operation.
- Maintaining the training records of all employees included in the training sessions.
- Maintaining a fire extinguisher map for the facility and performing an annual fire extinguisher audit.

The Maintenance Supervisor: Micha Lamoreaux-Office Manager

This person is responsible for:

- Administering the monthly inspection program
- Administering the use of an outside contractor for maintenance, hydrostatic testing and recharging.

Managers and Supervisors Who's Departments Contain Fire Extinguishers These people are responsible for:

- Knowing the locations of fire extinguishers in their areas.
- Understanding the fire hazards of specific processes in their departments.
- Ensuring that safe operations are maintained to prevent fires within their departments.

Program Activities

General

- Fire extinguishers will be selected according to hazards identified within the facility.
- Fire extinguisher selection will be documented with the fire extinguisher selection worksheet.
- Annual audit of all fire extinguishers will be performed to verify appropriate selection and locations.
- Only authorized employees shall use fire extinguishers.

Inspections

• Fire extinguishers will be inspected monthly using the fire extinguisher inspection form. All deficiencies will be noted and directed to the maintenance department for correction.

• All fire extinguishers will be serviced annually by an outside fire extinguisher contractor. This contractor will be responsible for performing all necessary hydrostatic testing.

Recordkeeping

Inspection and Maintenance Recordkeeping

To insure that all fire extinguishers are in safe operating condition, keep records of all inspections and maintenance. A fire Extinguisher monthly Inspection Sheet is provided in this Section.

Training Recordkeeping

Keep accurate records of all fire extinguisher training activities, recording all participants and training pertaining to this activity.

A Fire Extinguisher Training Record form that you can use for this purpose is provided in this section.

First Aid

Purpose

To define minimum company requirements and responsibilities for providing quality first aid and medical care for occupational injuries and illness.

This plan applies to all company employees.

Responsibilities

Management

- Ensure the ready availability of medical personnel for advice and consultation on matters of plant health.
- In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid.
- Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.
- Ensure there is a sufficient number of qualified first-aid providers on job sites if it will take longer than 3-4 minutes for adequate medical providers to respond to an injury
- Ensure that all Supervisors have a valid certificate in first-aid training from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence
- Ensure first-aid and health programs are adequate
- Maintain all required records
- Inspect First Aid Kits periodically to ensure supplies are always well stocked and not outdated
- Administration of all medical management programs
- Administration of the Return to Work Program
- Maintain Employee Health/Medical Files
- Provide all necessary services in a courteous and professional manner
- Follow accepted medical practices and procedures.
- Adhere to all standards of the Blood borne Pathogen Program

Supervisor

- Filling out the first report of injury and bring into office within 24 hours
- Inspect and refill first aid kit on job site periodically
- Attain emergency phone numbers and post them at the job site
- Transporting or calling emergency numbers that are posted to provide transportation for the injured person

Basic First Aid Steps

- Treat the most serious conditions first, such as stoppage of heart, severe bleeding, stoppage of breathing, and shock.
- Call 911 or the local fire department emergency number. Try to keep the victim comfortable. While waiting for medical help, an employee shall perform only those procedures for which he/she has been trained to help prevent the victim's condition from worsening. When there is any doubt about the victim's condition, or if a head or back injury is suspected, the victim should not be moved unless in immediate danger.
- Do not give liquids to a semi-conscious victim
- Remove any dentures from the mouth of an unconscious victim

First Aid Kits

- The contents of a first aid kit will meet or exceed requirements of ANSI Standard Z308.1-1998
- Kits will be available on every job site and will be located so as to allow easy and quick access. First aid kits and required contents are to be maintained in a serviceable condition.
- All items which must be kept sterile must be individually wrapped and sealed. Items such as scissors, tweezers, tubes of ointments with caps, or rolls of adhesive tape, need not be individually wrapped, sealed, or disposed of after a single use or application.

• Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.

Post-Accident Procedures

- For all accidents that result in injuries or property damage or that requires off-site medical attention and/or evaluation, a Drug and Alcohol screening will be conducted. This screening is part of the company Drug Free Workplace Program.
- Management will arrange for employees to see appropriate medical care providers for other than minor work related complaints.
- When an employee has been identified in writing by proper medical authority as having a condition that would limit them in their normal job function, management will assign limited duties to employee.
- Employee has to be released in writing by proper medical authority before management removes limited duty assignments.

Forklift & Industrial Trucks

Introduction

A powered industrial truck is defined as a mobile, power-driven vehicle used to carry, push, pull, lift, stack or tier material. Forklifts are one type of powered industrial truck. They are regulated under the OSHA Powered Industrial Truck Standard, 29 CFR 1910.178. All employees who utilize forklifts at Alta Construction, Inc. must adhere to this program.

Purpose

It is the policy of Alta Construction, Inc. to permit only trained and authorized personnel to operate powered industrial trucks.

Responsibilities

Office Manager/Management

- Monitoring and scheduling employee re-training
- Scheduling new hires training

Supervisors

- Notifying office to schedule Forklift Training for new employees, after they have been evaluated and found competent to operate Forklifts
- Knowing the hazards in their areas
- Assuring that safe operations are maintained within their departments to prevent injuries/illnesses
- Supervisors will ensure individuals not employed by Alta Construction, Inc. are prohibited from operating any powered industrial truck.
- Notifying Office Manager of any accidents, injuries, illnesses or near misses related to the use of powered industrial trucks.

Operator

- Using the forklift in accordance with manufacturer's instructions
- Properly maintaining the forklift in accordance with manufacturer's recommendations
- Completing the forklift inspections at the beginning of each shift
- Immediately placing a forklift out of service if the forklift fails the preoperational checklist
- Operating the forklift in a safe manner in accordance with the manufacturer's instructions and training provided by certified trainers
- Verifying that all trailers are chocked and secured prior to loading/unloading

Pre-Operational Procedures

Alta Construction, Inc. requires operators to perform pre-operational equipment checks on powered industrial trucks prior to the beginning of each shift in which those trucks will be utilized. Operators are to complete the daily Vehicle/Equipment Inspection Form (see below). A supply of these forms is provided with each forklift and at the Office. Fill out the comment section accurately to reflect any operational or visual defects to the Shop Department so they can repair the problem before the equipment becomes unsafe to operate. Describe the problem thoroughly so that the Shop personnel can pinpoint the trouble immediately.

The completed daily inspection forms will be turned into office once a week unless there are any defects with equipment then they need to be turned in immediately and arrangements made to get equipment fixed.

The office must retain all completed Daily Inspection Forms for each vehicle for at least one year.

Training

Under no circumstances shall an employee operate a powered industrial truck/forklift until he/she has successfully completed Alta Construction's Operation Training Program. The training program will be provided by a qualified trainer and will include classroom instruction and operational training on each specific powered truck in his/her work area.

Training topics will include but are not limited to: operating instructions, controls, capacity/stability, refueling, load stability, etc.

Every equipment operator are required to be re-evaluated every three years.

Employees who have successfully completed the classroom and operational instruction will be issued a certification from Alta Construction. Inc.

Re-training will be performed under the following conditions:

- Annually
- When an employee is involved in an accident or near miss with a forklift truck
- When an employee is repeatedly observed operating a forklift in an unsafe manner
- When a different truck is introduced into the workplace or an employee uses a forklift for which they have not previously received training

The supervisor will identify all new employees who will be responsible for driving a forklift truck and will notify office to schedule training.

GENERAL WASTE MANAGEMENT PROGRAM

INTRODUCTION

This section outlines administrative and procedural requirements for construction waste management activities on our construction site projects. Alta Construction, Inc. estimates the waste that will be generated prior to work being performed so that the need for containers and waste removal, if necessary, can be determined. Typically on our projects the same wastes or scrap materials are generated for every project.

DEFINITIONS

Construction, Demolition, and Landclearing (CDL) Waste: Includes all non-hazardous solid wastes resulting from construction, remodeling, alterations, repair, demolition and landclearing. Includes material that is recycled, reused, salvaged or disposed as garbage.

Salvage: Recovery of materials for on-site reuse or donation to a third party.

Reuse: Making use of a material without altering its form. Materials can be reused on-site or reused on other projects off-site. Examples include, but are not limited to the following: Grinding of concrete for use as subbase material. Chipping of landclearing debris for use as mulch.

Recycling: The process of sorting, cleaning, treating, and reconstituting materials for the purpose of using the material in the manufacture of a new product.

Source-Separated CDL Recycling: The process of separating recyclable materials in separate containers as they are generated on the job-site. The separated materials are hauled directly to a recycling facility or transfer station.

Co-mingled CDL Recycling: The process of collecting mixed recyclable materials in one container on-site. The container is taken to a material recovery facility where materials are separated for recycling.

Approved Recycling Facility: Any of the following: A facility that can legally accept CDL waste materials for the purpose of processing the materials into an altered form for the manufacture of a new product.

Material Recovery Facility: A general term used to describe a waste-sorting facility. Mechanical, hand-separation, or a combination of both procedures, are used to recover recyclable materials.

CONSTRUCTION WASTE MANAGEMENT, GENERAL

Waste materials should be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off. Provide containers for CDL waste that is to be recycled clearly labeled as such with a list of acceptable and unacceptable materials. The list of acceptable materials must be the same as the materials recycled at the receiving material recovery facility or recycling processor.

Provide containers for CDL waste that is disposed in a landfill clearly labeled as such.

If possible, include in material purchasing agreements a waste reduction provision requesting that materials and equipment be delivered in packaging made of recyclable material, that they reduce the amount of packaging, that packaging be taken back for reuse or recycling, and to take back all unused product. Insure that subcontractors require the same provisions in their purchase agreements.

Conduct regular visual inspections of dumpsters and recycling bins to remove contaminants.

CDL waste materials that can be salvaged, reused or recycled include, but are not limited to, the following:

Acoustical ceiling tiles Asphalt Asphalt shingles Cardboard packaging Carpet and carpet pad

Concrete

Drywall

Fluorescent lights and ballasts

Landclearing debris (vegetation, stumpage, dirt)

Metals

Paint (through hazardous waste outlets)

Wood

Plastic film (sheeting, shrink wrap, packaging)

Window glass

Wood

Field office waste, including office paper, aluminum cans, glass, plastic, and office cardboard.

Employees must be instructed on the proper disposal method for wastes. This may include general instruction on disposal of non-hazardous wastes, trash, or scrap materials. If wastes generated are classified as hazardous, employees must be trained to ensure proper disposal. The RSO, Thomas Hickman/Micha Lamoreaux, or designated representative will determine what level of HazWoper (hazardous waste operations) training is required.

SOURCE SEPARATION

General: Alta Construction, Inc. encourages proper segregation of waste materials to ensure opportunities for reuse or recycling. Separate recyclable materials from CDL waste to the maximum extent possible. Separate recyclable materials by type.

Provide containers, clearly labeled, by type of separated materials or provide other storage method for managing recyclable materials until they are removed from Project site.

Stockpile processed materials on-site without intermixing with other materials. Place, grade, and shape stockpiles to drain surface water. Cover to prevent windblown dust.

Stockpile materials away from demolition area. Do not store within drip line of remaining trees. Store components off the ground and protect from weather.

CO-MINGLED RECYCLING

General: Do not put CDL waste that will be disposed in a landfill into a co-mingled CDL waste recycling container.

REMOVAL OF CONSTRUCTION WASTE MATERIALS

Remove CDL waste materials from project site on a regular basis. Do not allow CDL waste to accumulate on-site.

Transport CDL waste materials off Owner's property and legally dispose of them.

Burning of CDL waste is not permitted unless specifically authorized by the site owner and complies with all laws.

GROUND FAULT CIRCUIT INTERRUPTER (GFCI)

Purpose

The purpose of this program is to provide procedures and guidelines to eliminate all injuries resulting from possible malfunctions, improper grounding and/or defective electrical tools. This program applies to all employees and shall be used on all locations.

Definitions

- A. **Electric Tool** for the purpose of this guideline, an electrical tool shall be defined as any portable device, which derives power from standard 120-volt alternating current.
- B. **Ground Fault Protection Device** a device which senses electrical current flowing to ground and interrupts power in the event that the current exceeds a set amount. Ground fault protection minimizes the chances of electric shock to personnel and damage to equipment.
- C. **Competent Person** a person 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.

Responsibilities

- A. Employees are responsible for following the requirements of this program, to perform visual inspections, to take defective equipment out of service, and to advise others who are not using proper ground fault protection to do so.
- B. On a monthly basis, Supervisors will assign a competent person to check all extension cords and electric hand tools located on the project site and the mechanic will check all extension cords and electric hand tools in shop. This shall be completed within one week from the monthly company safety meeting. Color-coded tape will be placed on each cord for documentation as follows:
 - a. Extension Cord: Tape placed on both ends.
 - b. Hand Tool Cord: Tape placed at the plug end.
 - c. Dec., Jan., Feb.: Red tape
 - d. March, April, May: Green tape
 - e. June, July, Aug.: Orange tape
 - f. Sept., Oct., Nov.: Blue tape

Procedures

- A. OSHA requires ground fault protection for all portable electric tools which utilize a standard electrical outlet for power.
- B. When ground fault protection is required, the following devices are deemed acceptable ground fault circuit interrupters:
 - a. An outlet which is protected by a ground fault circuit interrupter (GFCI) type circuit breaker.
 - b. An outlet which is designed to provide ground fault protection.
 - c. A distribution box (portable GFCI) which is equipped with ground fault protection.
- C. When ground fault protection is required, the following rules must be followed to insure proper protection:
 - a. If there is any question about whether the outlet being used is designed to provide ground fault protection or protected by a GFCI circuit breaker, a distribution box, which provides ground fault protection should be utilized.
 - b. The ground fault protection device should be placed as close to the power source as possible. There should not be an extension cord between the outlet and the ground fault protection device.
 - c. Neither the ground fault protection device nor the extension cord should be placed in standing water or in high traffic areas.
 - d. The ground fault protection device, (breaker, outlet, or distribution box), should be tested prior to each use to insure proper operation. This can be done by depressing the test switch. If the device is working properly, the interrupting device should be activated and must be reset. If the device does not activate, another protective device must be used and the defective device should be brought to the shop where it will be repaired or destroyed.
 - e. All portable equipment, including extension cords and portable tool cords should be inspected before each use for visual damage (external defects) and for indications of possible internal damage. If damage or defects are found, the equipment shall not be used and brought back to shop where it will be repaired or destroyed.
 - f. Every supervisor has a tester for checking grounded tools and extension cords.

- g. Double insulated tools need to be checked for integrity of the casing and make sure the cord is in good condition. The words double insulated or the initials DI need to be clearly marked on the tool from the manufacturer.
- h. Tests performed as required by this program shall be recorded as to the identity of each receptacle, cord set, & cord & plug connected equipment that passed the test and shall indicate the last date tested or interval for which is was tested. This record shall be kept by means of logs, color coding, or other effective means & shall be maintained until replaced by a more current record. These records shall be made available at the job site for inspection by the Assistant Secretary & any affected employees.

HAZARD COMMUNICATION (HazCom)

The purpose of this program is to inform interested persons, including employees, that Alta Construction, Inc. is complying with the OSHA Hazard Communication Standard, Title 29 Code of Federal Regulations 1910.1200, by compiling a hazardous chemicals list, using safety data sheets (SDSs), ensuring that containers are labeled or provided other forms of warning, and training our employees.

This program applies to all work operations in our company where employees may be exposed to hazardous chemicals under normal working conditions or during an emergency situation. Under this program, our employees will be informed of the contents of the Hazard Communication Standard, the hazards of chemicals with which they work, safe handling procedures, and measures to take to protect themselves from these chemicals, among other training elements.

Thomas Hickman/Micha Lamoreaux/Office Manager, the Hazard Communication Program Coordinator, has overall responsibility for the program, including to review and update the program, as necessary. Copies of this written program may be obtained from Micha Lamoreaux. Moreover, all employees, or their designated representatives, may obtain further information about this written program, the Hazard Communication Standard, applicable SDSs, and our chemical list from Micha Lamoreaux.

Finally, if after reading this program, you find that improvements can be made, please contact Thomas Hickman/Micha Lamoreaux/ Office Manager or Stuart J. Hickman/President. We encourage all suggestions because we are committed to the success of our written Hazard Communication Program. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

List of Hazardous Chemicals

Our "chemical inventory" is a list of product identifiers of hazardous chemicals known to be present at our workplace. Anyone who comes in contact with the hazardous chemicals on the list needs to know what those chemicals are and how to protect themselves. That is why it is so important that hazardous chemicals are identified, whether they are found in a container or generated in work operations (for example, welding fumes, dusts and exhaust fumes). The hazardous chemicals on the chemical inventory can cover a variety of physical forms including liquids, solids, gases, vapors, fumes, and mists. Sometimes hazardous chemicals can be identified using purchase orders. Identification of other chemicals may require an actual survey of the workplace.

Micha Lamoreaux updates the hazardous chemical inventory as necessary. The List will be reviewed at least on an annual basis and updated every time a new hazardous chemical is introduced to the inventory at Alta Construction, Inc.

The chemical inventory is attached to this written Hazard Communication Program. However, the Program Coordinator also keeps a copy of the chemical inventory list located on office computers where it is accessible during work hours. The chemical inventory serves as a list of every hazardous chemical for which an SDS must be maintained.

Safety Data Sheets (SDSs)

SDSs are basically fact sheets for chemicals that pose a physical or health hazard in the workplace. These sheets provide our employees with specific information on the chemicals in their work areas.

Micha Lamoreaux is responsible for obtaining and maintaining the SDSs at our workplace and will contact the chemical manufacturer or vendor if additional research is necessary. All new procurements for the company must be cleared by Thomas Hickman/Micha Lamoreaux or Stuart Hickman.

SDSs are kept readily accessible to all employees during each work shift at the following location(s): Every Supervisor's Truck and Front office at Shop. Employees may obtain access at any time.

The procedure followed if the SDS is not received with the first shipment is as follows: Micha Lamoreaux will contact manufacture either by phone or on their website to obtain the SDS as soon as possible after receiving the chemical.

Labels and Other Forms of Warning

In most cases, hazardous chemical containers at the workplace must be clearly labeled, tagged, or marked in accordance with the Hazard Communication Standard, either with:

- The product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s); or
- The product identifier and words, pictures, symbols, or combination thereof, which provide at least "general" information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the Hazard Communication Program, will provide employees with the "specific" information regarding the physical and health hazards of the hazardous chemical.

While not required for in-house labeling, the name and address of the manufacturer, importer, or other responsible party may also be found on the label, tag, or marking. Hazards not otherwise classified do not have to be addressed on a container.

Because the product identifier is found on the label, the SDS, and our chemical inventory, the product identifier links these three sources of information, permitting cross-referencing. The product identifier used by the supplier may be a common or trade name, a chemical name, or a number. Employees should be aware that label information can be verified by referring to the corresponding SDS.

Thomas Hickman/Micha Lamoreaux/Office Manager is responsible for ensuring that all hazardous chemicals in containers at the workplace have proper labels or other forms of warning that are legible, in English (although other languages may also be included), and displayed clearly on the container or readily available in the work area throughout each work shift, as required. This person will update labels, as necessary. Thomas Hickman/Micha

Lamoreaux/Office Manager also ensures that newly purchased chemicals are checked for labels when containers are received.

Thomas Hickman/Micha Lamoreaux/Office Manager is responsible for ensuring the proper labeling, tagging, or marking of any shipped containers leaving the workplace. These labels, tags, or marks must provide not only the product identifier, signal word, hazard statement(s), pictogram(s), and precautionary statement(s) but also the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

If employees transfer chemicals from a labeled container to a portable, secondary container that is intended only for their IMMEDIATE use, no labels, tags, or markings are required on the portable container. Otherwise portable containers must be labeled, tagged, or marked in accordance with our in-house labeling system for workplace containers.

The in-house labeling system we use for workplace container labeling is: Use of generic label (see attached) with the chemicals name and hazard on it.

Labels that fall off or become unreadable are immediately reported and replaced.

Everyone who works with or is potentially "exposed" to hazardous chemicals on the job will receive initial training on the Hazard Communication Standard and the safe use of those hazardous chemicals before starting work. "Exposure" means that "an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g., accidental or possible) exposure." Whenever a new chemical hazard is introduced or an old hazard changes, additional training is provided. All training is conducted by Paul Koch/Safety Manager.

Effective information and training is a critical part of the Hazard Communication Program. We train our employees to read and understand the information on labels and SDSs, determine how the information can be obtained and used in their own work areas, and understand the risks of exposure to the chemicals in their work areas, as well as ways to protect themselves. Our goal is to ensure employees know that they are exposed to hazardous chemicals, have the skills to read and use labels and SDSs, and understand how to appropriately follow the protective measures we have established. We urge our employees to ask their Supervisor questions for greater comprehension.

During non-routine tasks on customers sites Alta Construction employees will be trained and follow customer's site specific procedures for these tasks. This includes but is not limited to: the cleaning of reactor vessels & the hazards associated with chemicals contained in unlabeled pipes in their work areas.

Training Content

All employees will receive initial training after hiring, annually thereafter, and each time a new hazardous chemical gets introduced into the work area.

The training program emphasizes these elements:

- Summary of the Hazard Communication Standard.
- What hazardous chemicals are present in operations in employee work areas?
- Chemical and physical properties of hazardous chemicals (e.g., flash point, reactivity, etc.) and how to detect the presence or release of these chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.)
- Health hazards, including signs and symptoms of overexposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to them.
- Any simple asphyxiation, combustible dust, and pyrophoric hazards, as well as hazards not otherwise classified, of chemicals in work areas.
- Any steps the company has taken to reduce or prevent exposure to hazardous chemicals, such as engineering controls.
- Procedures to protect against hazards and exposure (e.g., work practices or methods to assure proper use and handling of chemicals and any required personal protective equipment and its proper use and maintenance).
- Procedures for reporting and responding to chemical emergencies.
- How to read and use both the workplace labeling system and labels received on shipped containers.
- The order of information found on SDSs and how to read the information and what it means.
- How to access SDSs and the written Hazard Communication Program, including the chemical inventory.

Training logs are signed by employees upon completion of their training and are kept by Micha Lamoreaux.

Moreover, it is the responsibility of each Supervisor to obtain from each contractor or other employer the appropriate hazard information on chemicals they bring onsite, including SDSs, the labeling system used, and the precautionary measures to be taken in working with or near these chemicals.

Additional Information

As stated earlier, all employees, or their designated representatives, may obtain further information on this written program, the Hazard Communication Standard, applicable SDSs, and the chemical inventory from their Supervisor or Management.

Appendix

We have attached to this written program our chemical inventory and other information to ensure better understanding of our program.

INJURY/ILLNESS RECORDKEEPING

Purpose

The purpose of this program is to define the requirements for recording job related injuries and illnesses for ALTA CONSTRUCTION, INC.

Scope

This policy shall cover all ALTA CONSTRUCTION, INC. operations within the United States. Specific guidelines are available at the following website link: http://www.osha.gov/recordkeeping/index.html.

Key Responsibilities

Safety Manager

- Shall ensure all job related injuries and illness are recorded properly in accordance with OSHA requirements.
- Shall ensure all required posting are conducted in accordance with recordkeeping guidelines
- Shall maintain all required records.
- Shall determine the proper classification of job related injuries or illnesses based on OSHA recordkeeping guidelines.

Supervisors

• Shall ensure that all job related injuries and illness are reported promptly to the ALTA CONSTRUCTION, INC. Safety Manager.

Employees

• Shall promptly report any actual or suspected job related injury or illness.

Procedure

If ALTA CONSTRUCTION, INC. is required to keep records of fatalities, injuries, and illnesses it must record each fatality, injury and illness that:

- · work-related; and
- is a new case; and
- meets one or more of the general recording criteria.

ALTA CONSTRUCTION, INC. must enter each recordable injury or illness on an OSHA 300 Log and 301 Incident Report, or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

The OSHA 300A Summary will be signed by an Alta Construction, Inc. official. An ALTA CONSTRUCTION, INC. executive must certify that he or she has examined the OSHA 300 Log and that he or she reasonably believes, based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete.

Posting

ALTA CONSTRUCTION, INC. must post a copy of the annual summary in each establishment in a conspicuous place or places where notices to employees are customarily posted. ALTA CONSTRUCTION, INC. must ensure that the posted annual summary is not altered, defaced or covered by other material.

The annual summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.

ALTA CONSTRUCTION, INC. must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover.

See next page for current OSHA recordkeeping forms as of this date.

OSHA RECORDKEEPING FORMS

Log of Work-Related Injuries and Illnesses To make tool information took early soft-maked (my or lines that incline loss of conscioures, worked not active or job transfer, days may from early, or maked in					extent possible while the information is being used for occupational safety and health purposes.					U.S. Department of Labor Occupational Safety and Health Administration Form approved OMS no. 1218-0178							
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Summa	ary of Wo	ork-Related	Injuries and Illness	Ses U.S. Department of L Occupational Salety and Reach Admini
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OSHA's Form 301 Injuries and Illnesses	Incident Report	Attaction: This form contains information realizing to employee health and must be used in a manner that protest the confidentially of employees to the extent possible with the information belong used for socupational safety and neath purposes. Occupational safety and health purposes.
	Information about the employee	Form approved OMS no. 1218-0 Information about the case
	1000	
This Injury and lilness incident Report is one of the	1) Full Name	
first forms you must fill out when a recordable work- related injury or illness has occurred. Together with	2) Street	11) Date of injury or illness
the Log of Work-Related injuries and linesses and the accompanying Summary, these forms help the	CityStateZip	12) Time employee began work AM/PM
employer and OSHA develop a picture of the extent	3) Date of birth	13) Time of event AM/PMCheck if time cannot be determined
and severity of work-related incidents. Within 7 calendar days after you receive	4) Date hired	14) What was the employee doing just before the incident occurred? Describe the activity, as we
information that a recordable work-related injury or illness has occurred, you must fill out this form or an	5) Male	as the tools, equipment or material the employee was using. Be specific. Examples: "climbing a ladder while carrying roofing materials"; "spraying chlorine from hand sprayer"; "daily computer key
equivalent. Some state workers' compensation,	Female	entry."
insurance, or other reports may be acceptable substitutes. To be considered an equivalent form,	Information about the physician or other health care	
any substitute must contain all the information asked for on this form.	professional	15) What happened? Tell us how the injury occurred. Examples: "When ladder slipped on wet floor.
According to Public Law 91-596 and 29 CFR	5) Name of physician or other health care professional	worker fell 20 feet"; "Worker was sprayed with chlorine when gasket broke during replacement";
1904, OSHA's recordkeeping rule, you must keep this form on file for 5 years following the year to		"Worker developed soreness in wrist over time."
which it pertains		
If you need additional copies of this form, you may photocopy and use as many as you need.	7) If treatment was given away from the worksite, where was it given?	
	Facility	16) What was the injury or illness? Tell us the part of the body that was affected and how it was affected; be more specific than "hurf," "pain", or "sore." Examples: "strained back"; "chemical burn.
	Street	anected; de more specific than inuit., pain , or sore. Examples: strained back; chemical burn, hand; "carpal tunnel syndrome."
	CityStateZip	
	8) Was employee treated in an emergency room?	
Completed by	☐Yes □No	 What object or substance directly harmed the employee? Examples: "concrete floor"; "chlorin "radial arm saw." If this question does not apply to the incident, leave it blank.
Title		
Phone Date	Was employee hospitalized overnight as an in-patient? Yes	
	□No	10) If the employee died, when did death occur? Date of death
		o data sources, dethering and meintaining the data needed, and completing and reviewing the collection of information. Persons are not

LEAD AWARENESS

Purpose

The purpose of this procedure is to advise employees in areas where lead is suspected on an awareness level basis about the properties and dangers of lead, general guidelines and training requirements. For more information, refer to the Lead safety procedure for ALTA CONSTRUCTION, INC..

Scope

This procedure applies to ALTA CONSTRUCTION, INC. operations where employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers ALTA CONSTRUCTION, INC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

Managers and Supervisors

- In coordination with the Safety Manager, develop and implement annual lead awareness training.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Identify possible locations where lead in the workplace may be found.
- Inform the Safety Manager of upcoming work involving known or suspected lead-containing materials, allowing the Safety Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the lead awareness requirements.

Safety Manager:

• Coordinate annual lead awareness training activities.

Employees:

- Comply with the lead awareness requirements and direct any questions or concerns to the Safety Manager.
- · Attend required annual training.
- Review material safety data sheets or consult with the supervisor to identify any container with leadcontaining material.

Procedure

Health Effects of Lead

Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache, joint or muscle aches, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

Locations

Each worksite shall create a list of possible locations of lead containing materials such as leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.

The list is to be provided to the Safety Manager on a quarterly basis and revised as lead containing materials are added or eliminated from the previous list.

General Requirements

Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials and will not disturb the lead containing material. Appropriate work practices shall be followed to ensure the lead containing materials are not disturbed. Regulated access signs are to demarcate the lead exposure regulated work areas. The signs should read as follows:

WARNING LEAD WORK AREA POISON NO SMOKING OR EATING

General Work Practices

When working on multi-contractor worksites ALTA CONSTRUCTION, INC. employees shall be protected from exposure. If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, ALTA CONSTRUCTION, INC. shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

Employees will wash hands and face if lead materials are contacted. Employees' hands and faces shall be washed if lead containing materials are contacted. Any possible contact with lead containing material must be reported immediately to the supervisor or Safety Manager.

If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed.

When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system.

Whenever possible, use a wet system to reduce airborne dust.

Whenever possible, substitute lead material with non-leaded material.

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

If respirators are required, they will be NIOSH certified and all employees will follow the ALTA CONSTRUCTION, INC. Respiratory Protection Program.

Training

Lead awareness training is required at time of hire, during orientation or before initial assignment in areas where lead is suspected and annual refresher training is conducted. Lead awareness training is required for employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. Lead awareness training is required at time of hire, during orientation, or before assignment to areas containing lead.

Refresher training must be given annually.

Documentation of training - Lead awareness training shall be documented including dates of training, location of training, employee name and trainer name.

Training will include the health effects of lead, how to report suspected locations of lead containing material and not to disturb any possible lead containing material.

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

LOCKOUT/TAGOUT

Purpose

The purpose of this program is to establish procedures for affixing appropriate lockout/tagout equipment to energy isolating devices and to otherwise disable machines or equipment to prevent unexpected energization, start up or release of stored energy to prevent injury or incident.

Scope

This program covers the servicing and maintenance of machines and equipment where the unexpected energization or startup of the machine or equipment, or the release of stored energy could cause an incident. This program establishes minimum performance requirements for the control of such hazardous energy. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers ALTA CONSTRUCTION, INC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected employee - An employee whose job requires them to operate or use a machine or equipment on which servicing and maintenance is being performed under lockout/tagout, or whose job requires the employee to work in an area in which such servicing or maintenance is being performed.

Authorized employee - A person that performs lockout/tagout procedures on machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes authorized when that employee's duties include performing servicing or maintenance covered under this program.

Capable of being locked out - An energy isolating device is capable of being locked out if it has a hasp or other means of attachment to which, or through which, a lock can be affixed, or it has a locking mechanism built into it. Other energy isolating devices are capable of being locked out if lockout can be achieved without the need to dismantle, rebuild or replace the energy isolating device or permanently alter its energy control capability.

Energized - Connected to an energy source or containing residual or stored energy.

Energy isolating device - A mechanical device that physically prevents the transmission or release of energy including, but not limited to, the following:

- A manually operated electrical circuit breaker, a disconnect switch, a manually operated switch by which
 the conductors and no pole can be operated independently, a line valve, a block and any similar device used
 to block or isolate energy.
- Push buttons, selector switches and other control circuit type devices are not isolating devices.

Lockout - The placement of a lockout device on an energy isolating device in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Lockout device - A device that utilizes a positive means, such as either a key or combination type lock, to hold an energy isolating device in the safe position and prevent the energizing of a machine or equipment. Included are blank flanges and bolted slip blinds.

Normal operation - The utilization of a machine or equipment to perform its intended operation.

Potential Energy Sources - Any source of gas, electrical, mechanical, hydraulic, pneumatic, chemical, gravity, steam, thermal, tension or other energy sources.

Servicing and/or maintenance - Workplace activities such as constructing, setting up, adjusting, inspecting, modifying and maintaining and/or servicing machines and equipment, where the employee may be exposed to an unexpected energization or startup of the equipment or release of a hazardous energy source.

Setting up - Any work performed to prepare a machine or equipment for performing its normal operation.

Tagout - The placement of a tagout device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout device - A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until tagout device is removed.

Key Responsibilities

Managers and Supervisors

- Responsible to control and enforce this plan and to see that all their employees and contractors that are
 affected by lockout/tagout procedures, have the knowledge and understanding required for safe
 application, usage, and removal of all energy controls and devices.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Employees who are affected by this program are required to attend training on an annual basis.
- Are required to follow the provisions of this program.

Procedure

General

Only an authorized employee or employees performing the servicing or maintenance shall perform lockout or tagout.

Devices

Lockout Device - If an energy source can be locked out a device that utilizes a lock to hold an energy isolating device in a safe position shall be used. Each site shall have the same type of lock as specified by ALTA CONSTRUCTION, INC..

Tagout Device – If an energy source cannot be locked out with a lockout device then a tagout device shall be used. Tagout devices are a warning only level of protection and shall be weather and chemical resistant, standardized in color with clear written warning of hazardous energy; i.e. Do Not Operate, Do Not Start, Do Not Energize, etc. Each site shall have the same style of tags specified by ALTA CONSTRUCTION, INC..

Specific Energy Control Procedures

Each manager or supervisor is responsible for developing specific step-by-step shutdown and startup procedures for a particular machine or piece of equipment in their respective area.

- A written, step-by-step isolation procedure for shutdown and startup shall be prepared for each type of machine or piece of equipment.
- This procedure shall include:
 - Equipment number if assigned.
 - o Equipment location.
 - o Energy Source(s) (i.e. electrical, hydraulic, gas pressure, etc.)
 - o Location of isolating controls (i.e. breaker switches, valves, etc.)
 - Quantity of isolating controls
 - O Quantity of locks required to isolate the equipment
 - Other hardware required to isolate the equipment (i.e. chains, valve covers, blocks, etc.)
 - O List any residual energy required to be dissipated before work begins.

1. Notification

Authorized employees must notify all other affected employees of the application and removal of lockout/tagout devices. Notification shall be given before the controls are applied and before they are removed from the machine or equipment.

2. Preparation for Shutdown

Before an authorized or affected employee turns off a machine or equipment, the authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled and the methods or means to control the energy.

3. Machine or Equipment Shutdown

The machine or equipment shall be turned off or shutdown using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.

4. Machine or Equipment Isolation

All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source.

5. Lockout/Tagout Devices and Application

- Each authorized employee shall have the proper number of locks and devices to be able to perform proper lockout/tagout procedures for machines or equipment that they may be working on.
- Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
- Lockout and tagout devices shall include name of individual placing device. Devices shall indicate the identity of the employee applying the device.
- Lockout devices shall be affixed in a manner to hold the energy isolating devices in a safe or off position.
- Tagout devices shall be affixed in a manner that will clearly indicate that the operation or movement of isolating devices from the safe or off position.
- Tagout devices used with energy isolating devices with the capability of being locked out shall be fastened at the same point at which the lock would have been attached. If a tag cannot be directly attached to the energy isolation device it shall be located as close as safely as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device.
- Each energy source shall be locked out completely isolating the equipment.
- Isolating machines or equipment shall include, but are not limited to:
 - o Pumps, compressors, generators, electric distribution, storage tanks, etc.
 - Each type of equipment to be isolated shall have specific procedures for isolation, i.e. for compressors: suction, discharge, power, starting, fuel, dumps shall be closed, locked and tagged out properly. The blow-down valve shall be opened, locked and tagged out properly. (NOTE): If compressor has a side stream hooked up, the side stream shall be closed, locked and tagged out properly.

6. Stored Energy and the Possibility of Reaccumulation

Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained and otherwise rendered safe.

If there is a possibility of re-accumulation of stored energy, verification of isolation shall be continued until the servicing or maintenance operation is completed, or until the possibility of such accumulation no longer exists.

7. Verification of Isolation

Prior to starting work on machines or equipment that have been locked or tagged out; the authorized employee shall verify that isolation and deenergization of the machine or equipment have been accomplished.

Procedures for Handling Multiple Groups of Workers Involved in a Group Lockout

A crew of authorized employees may use a group lockout or tagout device. This will afford the group of employees a level of protection equal to that provided by a personal lockout or tagout device. Procedures include:

- A tailgate meeting shall be conducted to review the lockout procedures and other information as required for safe work to continue all crafts and effected departments shall be involved.
- An authorized employee will isolate the equipment and ascertain the exposure status of individual group members.
- All workers will then place their individual locks on the device's group lockout or tagout device after they have verified the procedure.
- An authorized employee has primary responsibility for a set number of employees working under the protection of a group lockout or tagout device. The authorized employee should ascertain the exposure status of individual group members. Each ALTA CONSTRUCTION, INC. employee or contractor shall attach a personal lockout or tagout device to the group's device while he/she is working and then removes it when finished.
- During shift change or personnel changes, there are specific procedures to ensure the continuity of lockout or tagout procedures. These include:
 - O In the event shift or personnel changes occur during maintenance and/or repair activities, the designated ALTA CONSTRUCTION, INC. employee in charge shall take the necessary steps to maintain the continuity of the lockout/tagout protection. This includes maintaining that all provisions in this procedure are adhered to and the transfer of lockout/tagout devices between authorized employees is accomplished.
 - No work shall be allowed to proceed following personnel or shift change unless these requirements are met. The job supervisor must observe that all personnel or shift change locks or tags are properly transferred during the process.
 - O Before the last outgoing person is allowed to leave they must remove their lock (or warning tag) and the incoming ALTA CONSTRUCTION, INC. person shall affix their lock or (warning tag) to prevent the lock out device or tag warning device from ever not being locked or warning if a lock out device is not practicable.
 - O This also applies to all group lockout tagout situations.
 - This also applies to all contract personnel working on ALTA CONSTRUCTION, INC. or client projects.
 - o If any outgoing person leaves the site and their lock/tag is still attached then follow Removal of Locks guidelines below.

Release from Lockout/Tagout

When servicing or maintenance is completed or when Lockout / Tagout devices must be temporarily removed, the equipment requires testing and the machine or equipment is ready for testing or to return to normal operating conditions, the following steps shall be taken, in this order:

- Check the machine or equipment and the immediate area surrounding the machine or equipment to ensure that all nonessential items such as tools have been removed and that the machine or equipment components are operationally intact.
- Check the work area to ensure that all personnel have been safely positioned or removed from the area.
- Remove the Lockout/Tagout device
- Energize and proceed with testing
- Deenergize and reapply control methods including Lockout / Tagout devices
- Document the procedure by use of the completed isolation log and provide to supervisor for filing.

Removal of Locks

The authorized employee who applied the lock shall be the one to remove their lock. However, after all work has been completed, certain conditions may arise which prohibit this person from being present to remove the lock.

The following procedures shall be followed to allow for the removal of a lock that another person has applied:

- Every effort shall be made to contact the authorized employee who applied the lock to obtain the key(s).
- If the key(s) cannot be made available, the employee who requests removal of the lock shall contact their supervisor.
- The supervisor shall verify that every effort was made to contact the original authorized employee who applied the lock and to obtain the key(s).
- The employee removing the lock shall note on the Service Report that the lock(s) were removed with permission by supervisor.
- All reasonable efforts will be made by supervisor to notify that employee their lock has been removed, ensuring that the authorized employee has this knowledge before they return to work.
- If the equipment is client owned, the supervisor or employee requesting to remove the lock(s) shall contact the client to get the lock removed. Clients must remove their lock(s).
- NOTE: ALTA CONSTRUCTION, INC. employees shall not remove any client locks.

Contractors

Contractors performing lockout procedures on ALTA CONSTRUCTION, INC. property shall comply with this procedure. Contractors shall supply their own locks. ALTA CONSTRUCTION, INC. shall initially lockout ALTA CONSTRUCTION, INC. machines and equipment before the contractor will be allowed to apply their own lock in addition to the ALTA CONSTRUCTION, INC.'s.

Periodic Inspections of the Energy Control Procedure

Periodic inspections of the energy control procedure are conducted and documented at least annually to ensure procedures and requirements are being followed. Periodic inspections of the energy control procedure must be conducted at least annually to ensure that the procedure is being followed.

The ALTA CONSTRUCTION, INC. Safety Manager or their designee performs the inspection (it must be someone other than those actually using the lockout/tagout in progress). The inspector will produce a certified review of the inspection including date, equipment, employees and the inspection shall be documented. They will verify that:

- Each authorized and/or affected employee has been trained as required.
- Any new equipment added has specific lockout procedures developed and documented.
- Current procedures are adequate for performing complete isolation of equipment and resulting in a zero energy state.
- A copy of the audit maintained on file at the managers/supervisors office.

EMPLOYEE TRAINING

The training must include recognition of hazardous energy source, type and magnitude of energy available, methods and means necessary for energy isolation and control.

Each authorized employee shall receive adequate training.

All affected employees are instructed in the purpose and use of the energy control procedure.

Any other employees whose work operations are or may be in an area where energy control procedures may be utilized are instructed in the purpose and use of the energy control procedure.

Additional training includes:

- The purpose and use of energy control procedures.
- When tagout systems are used, employees shall also be trained in the following limitations of tags:

- Tags are essentially warning devices affixed to energy isolating devices, and do not provide the physical restraint on those devices that is provided by a lock.
- When a tag is attached to an energy isolating means, it is not to be removed without authorization of the
 authorized person responsible for it, and it is never to be bypassed, ignored, or otherwise defeated in any
 way.
- Tags must be legible and understandable by all authorized employees, affected employees, and all other employees whose work operations are or may be in the area, in order to be effective.
- Tags and their means of attachment must be made of materials which will withstand the environmental conditions encountered in the workplace.
- Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.
- Tags may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program.

Retraining

Retraining shall be conducted whenever a periodic inspection reveals, or whenever ALTA CONSTRUCTION, INC. has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

Retraining is required when there is a change in job assignments, in machines, a change in the energy control procedures, or a new hazard is introduced.

The retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary.

Training Documentation

ALTA CONSTRUCTION, INC. shall certify that employee training has been accomplished and is being kept up to date. All training and/or retraining must be documented, signed and certified.

SPECIFIC EQUIPMENT LOCKOUT PROCEDURES

Department		
Equipment No	o	
	ee	
Procedure for	Shutdown and Isolation:	
(List number of if necessary)	of steps required to isolate machine or equipment - write N/A on lines not used or add addit	ional steps
	STEP NO.	
	1	
	3	
	6	
	8	
	10Additional Information:	
Prepared By:_	Date:	

(This procedure to be communicated to all authorized and affected employees and kept on file at location of machine or equipment)

SAMPLE TAG



ISOLATION LOG

Da	ate of Isolation:				
D	escription of Work:				
Li	st of Equipment out o	f Service:			
No	ecessary Requirement	s of Clear Isolation:			
Αι	uthorized Employee S	ignature:			
Pe	erson Continuing World	k Signature:			
		Locks/Tags for GF	ROUP LOCKOUT or M	Multiple Locks/Tags	
	Lock # or Tag	Date Installed	Date Removed	Print Name (for Group Lockout)	Signature
-					
-					
-					
-					

(If additional space is needed, please attach an additional page)

ANNUAL AUDIT OF THE CONTROL OF HAZARDOUS ENERGY PROGRAM

I certify that an audit of the ALTA CONSTRUCTION, INC. "Control of Hazardous Energy" Program was conducted and that each employee has been trained in the recognition and procedures to lockout equipment they may be required to work on or may be affected by.

I further acknowledge that the current procedure is adequate to safely lockout equipment in this department for servicing and maintenance.

Department:	
Manager (or representative):	
Date:	
Original to file:	

Noise Exposure/Hearing Conservation Program

Introduction

This section contains information on the effects, evaluation, and control of noise. For assistance in evaluating a noise problem, contact the Responsible Safety Officer, Thomas Hickman/Micha Lamoreaux.

Danger of Noise

Exposing the ear to high levels of noise may cause hearing loss. This loss can be temporary or permanent. Temporary hearing loss or auditory fatigue occurs after a few minutes exposure to an intense noise but is recoverable following a period of time away from the noise. If the noise exposure is repeated, there may be only a partial hearing recovery and the loss becomes permanent. Typically, significant hearing losses occur first in the frequency range of 3,000 to 6,000 hertz (Hz). Losses in this frequency range are not critical to speech perception, and the individual usually is completely unaware of this initial symptom. With longer exposures, the hearing loss spreads to lower frequencies, which will affect speech perception. Workers' Compensation laws regard hearing losses in the speech frequency range of 500 to 3,000 Hz as being compensable.

The evaluation of hearing loss due to noise is complicated by the fact that hearing acuity normally decreases with increasing age. Further, the losses associated with age are quite similar to those caused by excessive noise since the hearing for high frequency sounds is most affected in both instances. Hearing impairment may also result from infections, tumors, and degenerative diseases.

ACGIH Standards

OSHA has prescribed the limits established by the American Conference of Governmental Industrial Hygienists as a standard for occupational noise exposure. Both the sound pressure level of the noise and the total duration of the noise exposure are considered to determine if these limits are exceeded. The sound pressure levels are expressed as dBA or decibels A-weighted. A-weighting filters are used when measuring sound levels to more accurately predict the response of the human ear to different frequencies.

When the daily noise exposure is composed of two or more periods of noise of different levels, their combined effect must be considered rather than the individual effect of each.

Permissible Noise Exposure

Duration per day (hours) vs. Sound level dBA (slow response)

8 Hours - 85 dBA

6 Hours - 92 dBA

4 Hours - 95 dBA

3 Hours - 97 dBA

2 Hours - 100 dBA

1.5 Hours - 102 dBA 1 Hour - 105 dBA .5 Hour - 110 dBA .25 Hour or less - 115 dBA Levels in excess of the permissible exposure limit as outlined in this section require use of the appropriate personal protective equipment- (hearing protection). Reducing Noise Exposure Noise exposure can be reduced by using engineering controls, administrative procedures, or personal protective devices. **Engineering Controls** Reduction of noise production at the source: Proper design of new machines Modification of present machines Proper repair and upkeep of equipment Use of appropriate mufflers Use of vibration dampeners on machines Reduction of noise transmission: Increase distance between noise and personnel exposed Construction of barriers between noise source and personnel Sound treatment of ceilings and walls Administrative Procedures: Job schedule changes Personnel rotation Personnel Protective Devices: Ear plugs

Earmuffs

Federal and state occupational safety and health regulations require that whenever employees are exposed to excessive noise levels, feasible engineering or administrative controls must be used to reduce these levels. When these control measures cannot be completely accomplished and/or while such controls are being initiated, personnel must be protected from the effects of excessive noise levels. Such protection can, in most cases, be provided by wearing suitable protective hearing devices.

The appropriate Medical Services provider and/or the supervisor of the Department will supply ear plugs for employees upon request or before going into a high noise area. There is a need for medical supervision when ear plugs are used because their effectiveness depends on proper fitting. Only approved plugs should be used. Ear plugs should be cleaned daily to prevent ear infections.

Protection greater than that provided by a single device can be obtained by wearing ear plugs under an earmuff. While the reduction provided by wearing both devices simultaneously is considerably less than the sum of the individual attenuations, it is still greater than when either device is worn separately.

Hearing Conservation Program

Alta Construction, Inc. shall administer a continuing effective hearing conservation program when employees are exposed to sound levels greater than 85 dbA on an 8 hour time-weighted average basis. When employees are exposed to sound levels greater than 85 dbA, hearing protection shall be provided at no cost to the employee. [2]

When information indicates that employee exposure may equal/exceed the 8 hr. time-weighted avg. of 85 decibels, Alta Construction, Inc. shall implement a monitoring program to identify employees to be included in the hearing conservation program. [3]

Alta Construction, Inc. shall establish & maintain an audiometric testing program by making audiometric testing available to all employees whose exposures equal or exceed an 8-hr. time-weighted avg. 85 decibels. [4] The elements of this program is as follows:

Within 6 months of an employee's first exposure at or above the action level, Alta Construction, Inc. shall establish a valid baseline audiogram against which future audiograms can be compared.

[5] When a mobile van is used, the baseline shall be established within 1 yr.

Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. [6] Hearing protection may be used to meet the requirement. Employees shall also be notified to avoid high levels of noise.

At least annually after obtaining the baseline audiogram, Alta Construction, Inc. shall obtain a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels. Each employee's annual audiogram shall be compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred. If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift, the employee shall be informed of this fact in writing, within 21 days of the determination. [7]

If a threshold shift has occurred, use of hearing protection shall be re-evaluated and/or refitted and if necessary a medical evaluation may be required. [8]

This is done at no cost to employee(s). Hearing protection shall be replaced as necessary. Alta Construction, Inc. shall ensure that hearing protectors are worn. [9] Employees shall be properly trained in the use, care & fitting of protectors.

Alta Construction, Inc. shall evaluate hearing protection for the specific noise environments in which the protector will be used. [10]

Alta Construction, Inc. shall maintain accurate record of all employee exposure measurements and that all records are maintained as required by the regulation. [11]

Alta Construction, Inc. shall institute a training program for all employees who are exposed to action level noise. The training shall be repeated annually for each employee. [1] Training shall be updated consistent to changes in PPE and work processes. Alta Construction, Inc. shall make available to affected employees copies of the noise exposure procedures and shall also post a copy in the workplace. Alta Construction, Inc. shall also allow the Assistant Secretary and the Director access to records.

SIGNALING CRANES

Purpose

Overhead cranes, hoists, and rigging equipment are used by ALTA CONSTRUCTION, INC. employees for lifting and moving materials and require coordinated and safe signaling procedures.

Scope

Applies to all ALTA CONSTRUCTION, INC. employees who operate overhead cranes, hoists, and rigging equipment in the scope of their job duties and assignments.

Key Responsibilities

Managers and Supervisors

- Are responsible to ensure that employees and contractors are trained and qualified on the proper operations and have been trained in crane and hoist safety including signaling safety.
- Are responsible to see that all provisions of this procedure are followed and that signaling operations are performed and the equipment is in safe operating condition.

Employees

- Employee operators are responsible to follow the requirements of this program.
- Employees designated as signalers are responsible to follow the requirements of this program.

General Requirements

Only one person may give signals to a crane at a time with the exception of emergency stop signals. Only one person shall give signals to a crane at a time, unless the emergency stop signal is given due to safety issues.

ALTA CONSTRUCTION, INC. shall ensure the testing of communication devices on site prior to beginning work. The device used to transmit signals must be tested on site before beginning operations to ensure that the signal transmission is effective, clear and reliable.

When a Signal Person Must Be Provided

A signal person must be provided in each of the following situations:

- The load travel or the area near or at load placement is not in full view of the operator.
- When the equipment is traveling, the view in the direction of travel is obstructed.
- The operator or person handling the load determines a signal person is necessary due to site specific safety concerns.

Stop Work Immediately

If signals between the operator and signal person are interrupted the operator must safely stop operations until communication is reestablished. The ability to transmit signals between the operator and signal person must be maintained. If the ability to transmit signals is interrupted at any time, the operator must safely stop operations requiring signals until communication is reestablished and a proper signal is given and understood.

The Types of Signals to be Used

Signals to operators must use the hand, voice, audible method. Means of transmitting the signals (direct line of sight, radio, etc.) must be suitable and appropriate for the site conditions. Hand signals must follow the Standard Method in Appendix A of Subpart CC of 29 CFR 1926.1419. See Standard Hand Signals illustrations at the end of this procedure.

Qualification Requirements of the Signal Person

Mandatory training is required for the following crane related personnel:

- Overhead power lines
- Signal persons
- Competent/qualified persons
- Operators
- Crush/pinch points
- Tag-out

Each signal person must:

- Know and understand the type(s) of signals used;
- Be competent in the application of the type of signals used;
- Have a basic understanding of equipment operation and limitations, including the crane dynamics involved in swinging and stopping loads and boom deflection from hoisting loads;
- Demonstrate that he/she meets the qualification requirements through an oral or written test, and through a practical test.

STANDARD HAND SIGNALS



STOP – With arm extended horizontally to the side, palm down, arm is swung back and forth.



EMERGENCY STOP – With both arms extended horizontally to the side, palms down, arms are swung back and forth.



HOIST – With upper arm extended to the side, forearm and index finger pointing straight up, hand and finger make small circles



RAISE BOOM – With arm extended horizontally to the side, thumb points up with other fingers closed.



SWING – With arm extended horizontally, index finger points in direction that boom is to swing.



RETRACT TELESCOPING BOOM – With hands to the front at waist level, thumbs point at each other with other fingers closed.



RAISE THE BOOM AND LOWER THE LOAD – With arm extended horizontally to the side and thumb pointing up, fingers open and close while load movement is desired.



DOG EVERYTHING - Hands held together at waist level.



LOWER – With arm and index finger pointing down, hand and finger make small circles.



LOWER BOOM – With aim extended horizontally to the side, thumb points down with other fingers closed.



EXTEND TELESCOPING BOOM - With hands to the front at waist level, thumbs point outward with other fingers closed.



TRAVEL TOWER TRAVEL — With all fingers pointing up, arm is extended horizontally out and back to make a pushing motion in the direction of travel.



LOWER THE BOOM AND RAISE THE LOAD – With arm extended horizontally to the side and thumb pointing down, fingers open and close while load movement is desired.



MOVE SLOWLY - A hand is placed in front of the hand that is giving the action signal.



USE AUXILIARY HOIST (whipline) – With arm bent at elbow and forearm vertical, elbow is tapped with other hand. Then regular signal is used to indicate desired action.



CRAWLER CRANE
TRAVEL, BOTH TRACKS –
Rotate fists around each other in
front of body; direction of
rotation away from body
indicates travel forward; rotation
towards body indicates travel
backward.



USE MAIN HOIST – A hand taps on top of the head. Then regular signal is given to indicate desired action.



CRAWLER CRANE TRAVEL, ONE TRACK – Indicate track to be locked by raising fist on that side. Rotate other fist in front of body in direction that other track is to travel.



TROLLEY TRAVEL – With palm up, fingers closed and thumb pointing in direction of motion, hand is jerked horizontally in direction trolley is to travel.

Subcontractor Management Plan

Program Overview

The subcontractor shall have a comprehensive written safety and health program. All employees shall understand basic element of this program prior to assignment to the project.

The subcontractor's safety plan, depending on scope of their work should address the following elements:

- Safety Policy
- Control Measures
- Safety Inspections/Audits
- Disciplinary Program
- Training Policy
- Project Site Employee Orientation Program
- Recordkeeping Policy
- Accident/Exposure and investigations policy
- Emergency Action Plan
- Site-Specific medical Emergency plan
- Hazard Communication Program
- Written Trenching and Shoring Plan (if applicable)
- Written 100% Fall Protection Plan
- Personal Protective Equipment

Site Specific Safety Plan

Subcontractors are required to submit their site-specific safety plan (SSSP) prior to the preconstruction meeting. In addition, their safety and health plan is reviewed by our RSO, Thomas Hickman/Micha Lamoreaux to assure that they meet the requirements of the site safety and risk control expectations. A subcontractor safety meeting will be held before initiating project work. This meeting is to review project requirements for safety and risk control. The subcontractor's safety officer and designated Competent Person(s) and any other necessary subcontractor's representatives shall attend the meeting. [3] In addition, subcontractors will be included in any tool box talk safety meetings, job safety analysis (JSA's), jobsite safety inspections, and any pre-job meetings or safety orientations with the site owner. [4]

The subcontractor shall present project-specific safety requirements, including a review of various roles and responsibilities of personnel, an initial overview of project risks, and elements of hazard control/ countermeasures appropriate to potential exposures.

Subcontractor Training Requirements

Subcontractor training records may be maintained electronically and/or on site in the job site office. These records shall be available to Alta Construction, Inc., the site owner, and government agencies upon request.

The subcontractor shall conduct a project specific safety orientation for all subcontractor personnel who work on the project before the personnel are allowed to perform any work.

Subcontractor Incident Reporting

The subcontractor's foreman or superintendent must ensure that all incidents are reported to Alta Construction, Inc. as soon as possible, but in no case more than four hours of the occurrence. The subcontractor's foreman or superintendent will follow up any verbal report with a copy of the subcontractor's incident report. Included with this report shall be any monitoring or corrective action plans. Copies of all incidents reported, including near misses, must be maintained on site.

Upon completion of a job, Alta Construction, Inc. shall conduct a post-job safety performance review of the subcontractor. [5] This review shall be made available to the RSO, and the site owner's representative.

Subcontractor Prequalification

Project procurement procedures require that all subcontractors submit prequalification documentation for evaluation. Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents, and safety statistics. [1] Acceptable safety metrics are an affirmative answer to those questions which are applicable to the subcontractor [2] (see Subcontractor Qualification Scorecard) and average or better scores under OSHA Information (see OSHA Information Sheet) and will be used as criteria for selecting subcontractors. An Alta Construction, Inc. Project Manager or RSO conducts the safety prequalification evaluation in accordance with the subcontractor prequalification process and scorecard form (included).

Subcontractor Qualification Scorecard

	tor Name:	
	ver the following q	
1.	Yes No	Do you have a written safety program? If yes, provide a copy of the table of contents and a copy of your firm's policy statement.
2.	Yes No	Do you require and use site-specific safety plans?
3.	Yes No	Do you have clearly defined safety responsibilities for managers, supervisors and workers?
4.	Yes No	Do managers/executives visit the worksite? How often? Provide details.
5.	Yes No	Does your company have a written drug/substance abuse policy?
6.	Yes No	Do you have an orientation program for new hires?
7.	Yes No	Do you conduct daily site safety inspections?
8.	Yes No	Do you have a disciplinary policy and procedure?
9.	Yes No	Do you hold site safety meetings for field workers & supervisors?
		How often? Weekly Biweekly Monthly Daily
10.	Yes No	Do you have special work procedures in place for critical or potentially high hazard jobs?
11.	Yes No	Do you have Personal Protective Equipment standards in place?
12.	Yes No	Do you have Emergency Action Plans in place for your worksites?
13.	Yes No	Do you have Joint Health and Safety Committee meetings?
14.	Yes No	Do you have a pre-job planning process (JSA, JHA, on-job hazard assessment)?
15.	Yes No	Do you have an accident and incident reporting system in place?
16.	Yes No	Do you have a procedure in place to investigate and follow-up on accidents and incidents?
17.	Yes No	Have you received any OSHA citations in the past 3 years? If yes, provide an attachment describing the outcome of the inspection along with copies of citations received. Provide a description of the actions taken for any open citations.
18	Vac No	Do you have a designated Competent Person on the project site?

OSHA INFORMATION:								
*Please use your OSHA 300 Log to fill in thillnesses for the last 3 years	e numb	er of inj	uries and	Total employee hours worked in the last 3 years (do not include any non-work time, even though paid)				
Year	1	2	3	Year 1 2 3	Hours			
Number of lost days/ restricted workday cases (Totals OSHA 300 Log, columns H and I). Days Away, Restricted, Transferred (DART) Rate Multiply total lost days/ restricted workday cases (Totals OSHA 300 Log, columns H and I) x 200,000 and divide by total employee hours for that year. (Col's. H+I) x 200,000 Total Employee Hours					Cases (Col's H+I-			
Number of other recordable cases (Total OSHA 300 Log, column J). Number of fatalities (Totals OSHA 300 Log column G).				Experience Modification F Policy Year 1 2 3	Rate (EMR) EMR			
Are the following accident records and acci	dent sur	mmarie	s kept? Ho	w often are they recorded? Yes	Monthly	Annually		
Accidents totaled for the entire company								
Accidents totaled by project								

The Applicant shall maintain records of such evaluations and make them available for review and approval of Contractor's and site owner's representatives at all reasonable times, should Applicant be awarded a contract based on this application.

By submitting this application, the Applicant agrees to use the above criteria and this form when selecting lower tier subcontractors.

Welding, Cutting, Hot Work Program

Introduction

This chapter contains guidelines and requirements for the safe use of flammable and/or compressed gases. It covers the use of flammable-gas piping systems, high-pressure gas cylinders, manifold cylinders, and compressed air. Cutters, welders and their supervisors must be suitably trained in the safe operations of their equipment and the safe use of the process. [2]

Hazards

All gases must be used in a manner that will not endanger personnel or property in routine shop use or experimental operations. Hazards associated with handling and use of flammable and/or high-pressure gases include the following:

Injuries caused by flying objects accelerated by an explosion or pressure release:

Asphyxiation;:

Secondary accidents such as falls or electrical shocks:

Fire caused by ignition of flammable gases:

Confined spaces: Ventilation is required, prohibiting cylinders in the space, lifelines for permitrequired spaces, electrode removal when not in use, and gas cylinder shutoff when not in use and warning signs are required. The RSO, Thomas Hickman/Micha Lamoreaux. shall be consulted prior to welding or cutting in any confined space.

Hazardous Fumes, Gases, Dusts: Any welding, cutting or burning of lead base metals, zinc, cadmium, mercury, beryllium or exotic metals or paints not listed here shall have proper ventilation or respiratory protection. [10]

Relief Valves Required

All systems, system components, and piping subject to over-pressures must be equipped with relief devices.

Operational Safety Procedures

Equipment containing highly toxic gases requires an Operational Safety Procedure (OSP) and must comply with the requirements described in the chapters on chemical safety. If you are in doubt as to the hazards, toxicity, or safe operating practices for any gases, consult the Responsible Safety Officer.

Fire Risk

Fire requires three elements: fuel, oxygen, and ignition. Any experiment or routine operation that places a flammable gas in the presence of an oxidant (air, oxygen) and an ignition source (spark, flame, high temperature) is extremely dangerous. To reduce the risk of fire, eliminate two of these three elements.

Thus, when using flammable gases, (1) eliminate ignition sources and (2) prevent mixing of fuel with air or oxygen. Contain or vent fuel.

Pyrophoric substances, which are materials that ignite spontaneously when exposed to air, require even more care. Minimize the use of oxygen in high concentration. Materials not normally considered combustible burn violently in high-oxygen atmospheres. Therefore, special precautions must be taken when working with high-oxygen concentrations.

Firewatch/ Fire Safety

Before cutting or welding is permitted the area shall be inspected by the RSO, or designated representative, responsible for inspection and granting authorized welding and cutting operations.

Precautions that are to be taken shall be in the form of a written hot work permit to authorize welding or cutting operations. Before cutting or welding is permitted the area shall be inspected and a written permit shall be used to authorize welding and cutting operations. [9] In many cases a firewatch may be required.

Assigned fire watchers must be trained in the use of fire extinguishing equipment and familiar with the facilities for sounding an alarm in the event of a fire. [1] If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed. [3] If all the fire hazards cannot be removed, then guards shall be used to confine the heat, sparks and slag and to protect the immovable fire hazards. [4]

If the object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards shall be used to confine the heat sparks and slag and to protect the immovable fire hazards. If welding cannot be conducted safely the welding and cutting shall not be performed. [5]

There are several conditions that require a fire watch. [6]

- 1) Locations where other than a minor fire might develop.
- 2) Combustible materials closer than 35 ft. (10.7M) to point of operation...
- 3) Combustibles that are 35 ft. (10.7M) or more away but are easily ignited.
- 4) Wall or floor openings within 35 feet (10.7M) radius expose combustible materials.
- 5) Combustible materials are adjacent to the opposite side of metal partitions, ceilings or roofs.

Fire watchers shall have fire extinguishers readily available. [7] A fire watch shall be maintained at least a half an hour after the welding or cutting operation was completed. [8]

First aid equipment shall be available at all times.

Guidelines

All personnel authorized to work with flammable gases must be familiar with the hazards and emergency measures that might be required in the event of an accident. For safe operation the following safety guidelines must be observed: A piping (schematic) diagram of the apparatus and an operating procedure that includes safety considerations and emergency instructions must be developed, and the installed piping must be inspected to ensure that it is installed as shown on the piping diagram. Only personnel authorized to work on the experiment are allowed in the operations

area. Appropriate warning devices and signs, such as "Danger-Acetylene" and "No Smoking and Open Flames," must be posted on or near the work area and at the doors to the operating area. Flammable gas shutoff valves must be located outside flammable gas operating areas. Good housekeeping practices must be observed; unnecessary combustible material must be kept out of flammable gas operating areas. Only the flammable gas cylinders actually required for the experiment are allowed in the operating area. Extra cylinders must be stored in an approved area outside the building or work area. When two or more cylinders containing flammable gas are used inside a room or other confined area, and are connected to a common manifold, the regulators must be modified. The existing relief valves on the regulator must be replaced with two special relief valves connected to a metal vent line that terminates outside and above the building. Likewise, when the building occupancy is rated H7, as

defined in the Uniform Building Code, all flammable gas regulators must have their relief valves vented to a vent line that terminates outside and above the building.

All ignition sources, e.g., welding torches, lit cigarettes, electric arcs, electrostatic charges, and pilot lights, must be kept away from flammable gases at all times.

Ventilation must be provided to prevent entrapment of flammable gases in closed areas. If the gas is lighter than air, overhead ventilation is required. Gases denser than air must be prevented from entering trenches and manholes where they can collect and form explosive mixtures with air.

Cracking an Acetylene gas cylinder valve before attaching the regulator is not recommended since the gas may be ignited by static charge or friction heating. Closing the valve stops the flame immediately.

Never use a flame to detect flammable gas leaks. Use soapy water or use other approved methods.

If a flammable gas cylinder is discovered with a small leak and the gas has not ignited, the cylinder must be moved carefully to a safe outside area. If the leak is serious or the gas has ignited, evacuate the area and contact the Alta Construction, Inc. Responsible Safety Officer and the local Fire Department immediately.

Oxygen

Oxygen supports combustion but is itself nonflammable. Oxygen lowers the ignition point (in air) of flammable substances and causes them to burn more vigorously. Materials (such as oil and grease) burn with nearly explosive violence in oxygen, even when they are in minute quantities. Therefore, oxygen cylinders must not be handled with greasy or oily hands or gloves and must not be stored near highly combustible materials such as oil, grease, or reserve acetylene.

Oxygen must never be used to purge lines, to operate pneumatic tools, or to dust clothing - cloth, plastics, etc., saturated with oxygen burn explosively. Accordingly, oxygen cylinders must never be used as hat racks, clothes hangers, etc., since leaky fittings can result in accumulations of gas in the covering material.

Insects in oxygen "pigtails" can ignite spontaneously and may cause sufficient heat and overpressure to burst the pigtail, valve, or manifold: don't leave pigtails disconnected for more than a few minutes. Do not use white lead, oil, grease, or any other non-approved joint compound for sealing oxygen-system fittings. Threaded connections in oxygen piping must be sealed with joint compounds or Teflon tape approved for oxygen service. Litharge and water is recommended for service pressures above 300 psig (2.0 MPa). Gaskets must be made of non-combustible materials.

When high pressure oxygen cylinders are stored inside a building, they must be separated from flammable gas cylinders by at least 20 feet or by a fire-resistive partition.

Acetylene

Acetylene is used principally with welding and cutting torches. Commercial acetylene gas is colorless and highly flammable with a distinctive garlic-like odor. Acetylene, in its free state under pressure, may decompose violently - the higher the pressure, the smaller the initial force required to cause an explosion. Therefore, acetylene is stored in acetone, which dissolves 300 times its volume of acetylene. Acetylene cylinders are filled with a porous filler material that holds the acetone. The combination of filler and acetone allows acetylene to be contained in cylinders at moderate pressures without danger of explosive decomposition. Full cylinder pressure is 250 psig at 70 degrees F.

CAUTION: when acetylene is withdrawn from its cylinder too rapidly, the gas cannot come out of solution fast enough, the downstream pressure drops, and liquid acetone is thrown out of the cylinder and may limit the flow of the pressure-reducing regulator.

The following precautions are recommended when working with acetylene:

To prevent flashbacks check valves are required in welding gas lines and at the welding/cutting torch. If the acetylene pressure drops, the oxygen pressure at the torch can push oxygen back up the acetylene line, where it can mix with acetylene and cause a flashback.

Copper must not be used in acetylene piping - copper forms an impact-sensitive copper acetylide.

NEVER use free acetylene gas outside the cylinder at pressures over 15 psig (30 psia) -- it can decompose violently.

Acetylene cylinders should be used or stored only in an upright position to avoid the possibility of acetone leaking from the cylinder. If an acetylene cylinder has been stored horizontally, the cylinder should be put up right and left in that position for about 30 minutes before being used.

When cylinders are empty of acetylene, valves must be closed to prevent evaporation of the acetone.

Acetylene cylinders may be filled only by the supplier.

Magic Gas

Magic Gas (magic gas II). This p	particular mixture is denser than air and consists of the following
Isobutane 23.52%	
Methylal (dimethoxy-methane)	4.00% (nominal)

Freon 13-B1	0.48%
Argon	72 00%

This gas is purchased premixed in Matheson 1F (Fat Boy) cylinders pressurized to 35 psig. The flammable limits of this gas are about 1.8% to 7% in air.

Alta Construction, Inc. safety rules for high pressure cylinders and flammable gases apply to all uses of Magic Gas.

Cylinders

Only cylinders meeting Department of Transportation (DOT) regulations may be used for transporting compressed gases. Each cylinder must bear the required DOT label for the compressed gas contained, except under certain specified conditions set forth in DOT regulations.

It is illegal to remove or to change the prescribed numbers or other markings on cylinders - do not deface, cover, or remove any markings, labels, decals, or tags applied or attached to the cylinder by the supplier. Each cylinder that is in use at Alta Construction, Inc. must carry a legible label or stencil identifying the contents. Do not repaint cylinders unless authorized by the owner.

Compressed-gas containers must not contain gases capable of combining chemically, nor should the gas service be changed without approval by Responsible Safety Officer.

The cylinder-valve outlet connections on cylinders containing gas mixtures are provided by the gas supplier, based on the physical and chemical characteristics of the gases.

Gas mixtures having a flammable component must have a cylinder-valve outlet connection with left-handed threads, even though the gas mixture is nonflammable, unless Responsible Safety Officer has authorized otherwise.

Regulators, gauges, hoses, and other appliances provided for use with a particular gas or group of gases must not be used on cylinders containing gases having different chemical properties unless information obtained from the supplier indicates that this is safe.

Gases must not be mixed at Alta Construction, Inc. sites in commercial DOT cylinders and must not be transferred from one DOT cylinder to another. Gases that are mixed at Alta Construction, Inc. must never be put into a Alta Construction, Inc. - or vendor-owned compressed gas cylinder.

Vendor-owned cylinders must not be used for any purpose other than as a source of vendor-supplied gas. Only the vendor may pressurize these cylinders.

It is illegal to transport a leaking cylinder (charged or partially charged) by common or contract carrier.

Cylinder Handling

Compressed gases should be handled only by experienced and properly instructed personnel. When in doubt about the proper handling of a compressed gas cylinder or its contents, consult the Responsible Safety Officer.

Compressed gas cylinders are dangerous when handled incorrectly. Always assume that a cylinder is pressurized. Handle it carefully. Never throw, bang, tilt, drag, slide, roll, or drop a cylinder from a truck bed or other raised surface. If a cylinder must be lifted manually, at least two people must do the lifting. Because of their shape, smooth surface, and weight, gas cylinders are difficult to move by hand. A truck or an approved cylinder handcart must always be used to move a cylinder. Cylinders must be fastened in metal cradles or skid boxes before they are raised with cranes, forklifts, or hoists. Rope or chain lifting slings alone must not be used. Cylinders, even empty ones, must never be used as rollers for moving materials, as work supports, etc.

If damaged, a cylinder can cause severe injuries, including lung damage from inhalation of toxic contents and physical trauma from explosion. A pressurized gas cylinder can become a dangerous projectile if its valve is broken off.

Workers in charge of oxygen or fuel-gas supply equipment (including distribution piping systems and generators) must be instructed and judged competent for such work.

When a cylinder is not connected to a pressure regulator or a manifold, or is otherwise not in use, it is extremely important that the cylinder valve be kept closed and the safety cap be kept in place -- the cap protects the cylinder valve (do not lift cylinders by their caps). Notify the Responsible Safety Officer, giving details and cylinder serial number, if you believe that a foreign substance may have entered the cylinder or valve.

Cylinders containing compressed gases should not be subjected to a temperature above 125 degrees F. Flames, sparks, molten metal, or slag must never come in contact with any part of a compressed gas cylinder, pressure apparatus, hoses, etc. Do not place cylinders where they might become part of an electric circuit. When cylinders are used in conjunction with electric welding, ensure that the cylinders cannot be accidentally grounded and burned by the electric welding arc.

Cylinders must not be subjected to artificially low temperatures. Many ferrous metals become extremely brittle at low temperatures. The loss of ductility and thermal stress at low temperature may cause a steel cylinder to rupture.

Never attempt to repair, alter, or tamper with cylinders, valves, or safety relief devices.

Working With Gases

Always identify the contents of a gas cylinder before using it. If a cylinder is not clearly labeled, return it to the Responsible Safety Officer.

Before using a cylinder, be sure it is properly supported with two metal chains or the equivalent to prevent it from falling. Contamination of compressed gas cylinders by feedback of process materials must always be prevented by installation of suitable traps or check valves.

Suitable pressure-regulating devices and relief devices must always be used when gas is admitted to systems having pressure limitations lower than the cylinder pressure.

Gas cylinder valves can be "cracked" (opened slightly) momentarily before regulators are attached to blow dirt off the valve seats, but the valve outlet should always be pointed away from people or equipment. (Cracking the valve is not recommended with Acetylene because it can be ignited by static charge or friction.) After the regulator is securely attached to the cylinder valve, fully release (turn counter-clockwise) the pressure-adjusting screw of the regulator before opening the cylinder valve. Open gas cylinder high pressure valves slowly; this gives compression heat time to dissipate and prevents "bumping" the gauges. Never use a wrench on any cylinder-valve hand wheel.

Keep removable keys or handles on valve spindles or stems while cylinders are in service.

Never leave pressure in a system that is not being used. To shut down a system, close the cylinder valve and vent the pressure from the entire system. Equipment must not be disassembled while it is under pressure. Be aware that any valved-off portion of the system may still be under pressure; bleed the hose, line, or vessel before disassembly to ensure that there is not enough pressure energy stored in the trapped gas or in piping distortion to propel loose objects.

Connections to piping, regulators, and other appliances should always be kept tight to prevent leakage. Where hose is used, it should be kept in good condition.

Manifold pigtails should not be left disconnected for more than a few minutes. Certain insects are attracted to pure gases and will quickly clog these lines.

Never use compressed gas to dust off clothing; this may cause serious injury or create a fire hazard.

About 30 psi gauge pressure (0.2 MPa) must be left in "empty" cylinders to prevent air from entering the cylinder and contaminating it; air contamination in an Acetylene cylinder is extremely dangerous.

Before a regulator is removed from a cylinder, close the cylinder valve and release all pressure from the regulator.

Before returning an empty cylinder, close the valve and replace the cylinder-valve protective cap and outlet cap or plug, if used.

Cylinder Storage

When transporting, moving and storing compressed gas cylinders and oxygen cylinders shall be stored in an upright secured position 20 feet from any flammable gases or petroleum products. Oxygen cylinders shall be stored in an upright secured position 20 feet from any flammable gases or petroleum products.

Cylinders not actively in use inside of buildings must be stored outside in areas approved by Responsible Safety Officer and must be fastened - with two metal chains or bars or in a fixture - to prevent them from falling if they are bumped or shaken, as during an earthquake.

When gases of different types are stored at the same location, cylinders must be grouped by types of gas, and the groups must be arranged in accordance with the gases contained, e.g., flammable gases must not be stored near oxygen.

Charged cylinders and empty cylinders should be stored separately in an arrangement that permits removal of "old stock" (cylinders in storage the longest) with minimum handling of other cylinders.

Storage rooms or areas should be dry, cool, well ventilated, and, where practical, fire resistant; must have solid, level floors or storage surfaces; and must be away from traffic. Storage in subsurface locations should be avoided. Cylinders must not be stored at temperatures above 125 degrees F. or near radiators or other sources of heat, near sparking devices, or near salt or other corrosive chemicals. If stored outside, cylinders must be protected from continuous direct sunlight, extreme weather, or moisture.

Compressed Air

Compressed air for general shop or laboratory use must be restricted to 30-psig (207-kPa) maximum pressure by restricting nozzles. Compressed air at pressures up to 100-psig (700-kPa) may be used to operate pneumatic tools, certain control instruments, and research equipment with properly designed over-pressure relief devices. Use of air-pressurized research equipment must be approved by the Responsible Safety Officer.

Building compressed air (house air) may be used to dry parts and to help accomplish many other jobs in the shop or laboratory, but always ensure that no one is in line with the air stream and always wear goggles or a face shield.

Compressed air must not be used for breathing unless it has been especially installed for this purpose and such use has been approved by Responsible Safety Officer.

Never apply air pressure to the body or use compressed air to clean clothing. Compressed air injected into the body openings can be fatal. Compressed air used to clean clothing drives particles into the fabric, where they can cause skin irritation and infections. Use a clothes brush.

Compressed air must not be used to transfer liquids from containers of unknown safe working pressure. A pressurized commercial drum of unknown pressure rating is a hazardous device; for example, a 55-gal (200liter) drum pressurized to 14.5 psig (100 kPa) has a force on the drum head of about 3 tons. To transfer liquids use a pump or a siphon with a bulk aspirator. The transfer pressure for commercial-type liquid nitrogen dewars must be less than 14.5 psig. For most laboratory-type liquid nitrogen systems, transfer pressures of less than 5 psig are adequate. Compressed air must never be used for transferring liquid hydrogen or liquid helium.

When an automatic shut-off coupling is not used on air-operated tools, a short metal chain (or its equivalent) should be attached to the hose to prevent it from whipping in case it separates from the tool. When using an air-operated tool, shut off the compressed air and vent the hose before changing nozzles or fittings.

Welding & Cutting

Protecting yourself when performing welding operations depends on your understanding of the hazards involved and the proper way to control them. Control of welding hazards include avoiding eye injury, respiratory protection, ventilation of the work area, protective clothing and having safe equipment to use. Workman assigned to operate arc welding equipment must be properly instructed and qualified to operate such equipment. Workmen assigned to operate or maintain equipment be

familiar with section (1910.254) and with 1910.252(a)(b) & (c). Operators of equipment shall report any equipment defect or safety hazards and discontinue use of equipment until its safety has been assured and repairs shall be made only by qualified personnel. [11]

Eye hazards include exposure to ultraviolet and infrared light. Welders and their helpers should wear filter glasses with shades ranging from 2 to 14, depending on the type of welding being done, to protect their eyes. Unless a welding arc is behind a screen, not only the welder, but also people nearby may need eye protection. Other workers should be excluded within a 30 foot radius from gas or low powered arc welding, or also be protected with appropriate filter lenses. Heavy welding requires a 100 foot radius. Inert gas welding produces 5 to 30 times as much ultraviolet light as arc welding and requires shielding for even greater distances. Keep in mind that ordinary untreated plastic lenses absorb ultraviolet light very poorly and should not be relied on for protection. Virtually all welding processes generate gases, fume and dusts. Gases generated include carbon monoxide, carbon dioxide, ozone, and nitrous gases. Other gases may also be formed in the presence of chemicals which may be on the material being welded. For example 1,1,1 Trichloroethane generates phosgene gas when exposed to the heat of welding. Welding and cutting can also generate fumes from cadmium, lead, cyanide, beryllium, arsenic, fluorides, nickel, cyanide, and other materials when can be hazardous if inhaled. Proper respiratory protection should always be worn when cutting or welding. The best type of protection to use can be determined by reading the Material Safety Data Sheet for the material being welded, or the manufacturer of the rod or flux being used.

Mechanical ventilation at the rate of 2,000 cubic feet per minute per welder is required if the area is more crowded than 10,000 cubic feet per welder; has a ceiling height of less than 16 feet; or in confined spaces where structural barriers significantly obstruct cross ventilation. Additional specific ventilation requirements are necessary for fluorine compounds, zinc, lead, beryllium, cadmium, mercury, and for stainless steel that is oxygen cut using either a chemical flux or iron powder or gas shielded arc cutting. Where it is not possible to provide this ventilation, airline respirators, hose masks, or self-contained units must be used. Oxygen should never be used for ventilation. All parts of the body should be protected from radiant energy, sparks, and molten metal splashes. Clothing made from wool, or wool blends, is generally better than cotton. Some cutting operations such as inert-gas metal arc welding will cause exposed cotton clothing to rapidly deteriorate. Leather capes, jackets, leggings, and aprons provide additional protection especially in vertical, or overhead operations. Use of dark clothing will help reduce reflected light.

All welding equipment should be inspected each day prior to use. Report any defects found in regulators, torches or electrical components to a person that is qualified to make the necessary repairs.

VENTILATION

The fumes produced in a welding operation can be hazardous to the welder or workers in the near vicinity. Reducing the exposure to fumes through an effective local exhaust or area ventilation system is the first line of defense in preventing discomfort or illnesses from toxic welding fumes. Respirators are another means of reducing exposure. This personal protective equipment should be considered a temporary process until more appropriate measures to control the exposure are in place. However, when the level of the exposure cannot be entirely eliminated by an exhaust ventilation system, some form of respiratory protection will be required when welding is performed. Highly toxic or concentrated welding fumes may require the welder to use a supplied air hood-type respirator, no matter what type of ventilation is in place.

Testing equipment is needed to effectively evaluate the levels of toxicity welding fumes emit. Many toxic fumes are colorless and odorless, and chronic effects of overexposures may not be immediately detectable. Harmful levels of welding fumes cannot be determined by relying on your body's senses. You may see smoke in the air, smell an irritant and not be adversely affected. In order to accurately

determine the level of the contaminants present, air quality testing equipment in the way of air sampling pumps are placed in the area and on the welder. This equipment pulls air through a filter for a specified amount of time. The sample is then evaluated at a laboratory to determine the levels of the exposure.

The degree of exposure present determines which type of ventilation system is most appropriate. In field locations, such as construction projects and shipyards, 'sucker' hoses can be set up to pull fumes from the welding zone. Welding booths with local exhaust hoses at each station gives the welder some flexibility and mobility in performing the operation. In situations where the welder must go to the work area (due to size, weight or the unwieldy configuration of the work piece), portable exhaust systems could be an option to consider. In some situations, laboratory-type hoods may be used for ventilation. This type of system creates a high velocity exhaust vacuum within an enclosure. Using Laboratory-type hoods allow only the welder's hands/arms in the enclosure while welding is being performed.

Determining the needed ventilation and/or respiratory protection must be taken very seriously. Systematically evaluate the process, exposures and possible controls to determine which will help ensure providing an employee a safe place to work.

Once protective measures have been determined, it is the responsibility of each welder and their supervisor to make sure they are being used properly. Taking a proactive step in reducing your exposure to welding fumes is the professional approach to working as a welder.

Alta Construction

Fit for Duty Policy

It is Alta Constructions desire to provide a drug-free, healthy and safe work place. To achieve this goal, employees are required to report to work fit to perform their jobs in a satisfactory manner and be physically able to perform their duty.

If an employee is observed by co-workers and supervisor to be possibly unfit for duty, they will be placed on leave until further assessments can be made. Emergency medical care will be immediately obtained whenever there is a question of acute illness or impairment that threatens the safety of the employee or others. Drug and alcohol testing will be required for pre-employment, post-accident and random as per Client and Alta Construction policy.

While on Alta Construction's property and while conducting business related activities off-site, no employee may use ,possess, distribute ,sell, or be under the influence of alcohol or engage in the unlawful manufacture, distribution, dispensation, possession or use of any controlled substance or illegal drug. Violation of this policy may lead to disciplinary action up to and including immediate termination.

The legal use of prescribed drugs or over the counter drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and safely in a manner that does not endanger clients or other individuals in the workplace. An employee who is using prescribed medication should discuss this with their supervisor. If it is determined that the employee is unable to perform their job without impairment caused by medication then employee will be directed not to work until fully able to perform job tasks. Employees with medical conditions are urged to work with supervisors to consider all reasonable accommodation options in order to continue to work. It is the responsibility of the employee to notify supervisor if employee feels they are too fatigued to continue their job functions.

Abrasive Blasting Policy

Abrasive blasting is the most common surface preparation technique used to remove old paint and other surface material such as rust, scale, dirt and salts. Compressed air is used to propel abrasive material from a blast pot, through a blasting hose to a nozzle, where it is directed to the work area at high velocity by the operator. Air pressure is typically high, 100 psi or more and velocities can reach 600-1700 feet per second.

Health Hazards:

Air contaminants:

Exposure to dust and air contaminants is the primary health hazard associated with abrasive blasting. The source of the air contaminates includes the base material being blasted, the surface coating being removed, the abrasive being used and any abrasive contamination from previous blasting operations. The Concentration of respirable dust or fumes must be kept below the limits stated in CFR 1910.1000.

Contaminants in base materials might include; aluminum, cadmium, chromium, copper, iron, lead, nickel and zinc.

Surface coatings can include zinc-based primers and metal based anticorrosive and antifouling paints. Anti-fouling paint typically include copper-based and tributly tin-based paints. Metal based paints can contain up to 30% heavy metals. Depending on the surface coating being blasted, potential air contaminants might include barium, cadmium, chromium, copper, lead, zinc and other types of air contaminants.

Common blasting abrasives include coal slag, copper slag, other metallic grit and shot. Silica use is not as common because of the health hazards associated with silica dust. The use of non-silica abrasives results in non-detectable or lower levels of airborne crystalline silica, but levels of other hazardous air contaminants can be elevated.

Control Measures

Engineering Controls

- A. Substitution. Select a safer abrasive blasting agent. Keep the following in mind when selecting an alternative blasting agent.
 - 1. Alternative agents can result in elevated levels of other hazardous air contaminants.
 - 2. Alternative Agents can contain small amounts of crystalline silica and might result in elevated levels of airborne crystalline silica if used in confined or enclosed spaces.
 - 3. The use of appropriate procedures for the cleanup and disposal of waste material.
- B. Isolation or Enclosure. Minimize exposure to employees by isolating blasting operations through the use of:
 - 1. Blasting cabinets.
 - 2. Blasting Rooms.
 - a. Blast cleaning enclosures must have ventilation exhaust and inward flow of air will be maintained.
 - b. The construction, installation, inspection and maintenance of exhaust systems shall conform to ANZI 233.1 and/or CFR 1910.6.

- 3. Temporary Enclosures.
- 4. Exclusion Zones.
- C. Process or Equipment Changes. Alternative techniques to dry abrasive blasting may be used to reduce or eliminate the amount of dust generated. Alternative methods include:
 - 1. Wet abrasive blasting.
 - 2. Hydro-blasting.
 - 3. Centrifugal wheel blasting.
 - 4. Vacuum blasting.
 - 5. Dry ice pellets.
 - 6. Thermal Stripping.
 - 7. Chemical Stripping
 - 8. Mechanical Stripping.
- D. Ventilation. All blast cleaning enclosures must be adequately ventilated.
- E. Wet Methods. If a wet blasting technique is not feasible, consider using a water hose to wet down the dust at the point of generation.

Work Practices:

Good work practices include:

- A. Do not allow dust to accumulate on floors and shelves outside of blasting enclosures.
- B. Clean up spills promptly.
- C. Keep aisles and walkways clear to prevent slips, trips and falls.
- D. Use vacuums equipped with HEPA filters when removing accumulated dust.
- E. Schedule blasting when the least number of people will be exposed.
- F. Blast in a specified location as far away from other employees as possible.
- G. Stop other work and clear people away while blasting is taking place.
- H. Clean up paint chips, dusts, and used abrasive as soon as possible after blasting is finished.
- I. Avoid blasting in windy conditions.
- J. Post warning signs to mark boundaries of work areas contaminated with blasting dust and alert personnel to the hazard and any required PPE.

Personal Hygiene:

These practices are an important control measure for protecting personnel from exposure.

- A. Do not eat, drink, use tobacco products or apply cosmetics in abrasive blasting areas.
- B. Wash hands before eating, drinking, smoking etc.
- C. Shower and put clean clothes on as soon as possible.
- D. Park cars where they will not be contaminated with abrasive blasting dust.

Personal Protective Equipment:

If engineering and administrative controls cannot keep exposures below OSHA permissible exposure limits, employees must use NIOSH certified respirators.

A. Abrasive blasting operators must wear a sullied air respirator.

- B. Air for respirators shall be free from harmful quantities of dust, mists, noxious gases and must meet requirements in CFR 1910.134(i).
- C. Appropriate respiratory must also be provided for other employees working in areas where abrasive materials and dusts are present.
- D. The requirements for Alta Constructions respiratory program must be met by all employees who wear respirators.

In addition to respiratory protection, the following additional PPE may be required.

- A. Eye and face protection.
- B. Heavy canvas or leather gloves and aprons.
- C. Safety toed boots.
- D. Hearing protection.
- E. Fall Protection.

Other Safety Hazards:

High speed particles: Personnel can be struck by high speed particles from blasting media of the surface being blasted.

- A. Never point a blast nozzle at a person.
- B. Use a dead-man control device at the nozzle end of the blasting hose.
- C. Ensure that only one employee operates each blast nozzle.
- D. Use appropriate PPE.

High Pressure Hazards: Contact with high pressure air or water streams, uncontrolled high pressure hoses, and air or water leaks can cause significant injuries.

- A. Control access to blasting zone.
- B. Use dead-man control at nozzle.
- C. Use a metal nozzle and hose couplings.
- D. Use hose coupling safety locks and whip checks.
- E. Inspect all hoses and connections prior to use.
- F. Use appropriate PPE.

Static Electricity:

Static electricity can be generated by abrasive blasting equipment, the surfaces be blasted, and exhaust ventilation systems. Static electricity can shock employees and cause fires and explosions by igniting flammable/combustible atmospheres or materials. The proper use of bonding and grounding can prevent buildup of static electricity. Blast hoses can be constructed with anti-static rubber linings or fitted with a ground wire or similar mechanisms.

Vibration and Ergonomic Hazards:

Blast operators are exposed to hand-arm vibration from the force of the abrasive moving through the hose.

- A. Use vibration reducing equipment.
- B. Reduce the extent and duration of continuous exposure.
- C. Proper maintenance of blasting equipment.

D. Use protective gloves, which include vibration reduction design, to keep hands warm and dry.

Confined Spaces:

Confined spaces can contain dangerous atmospheres. Abrasive blasting is considered "hot work". Abrasive blasting may also introduce additional contaminants into the space.

Working at Heights:

Fall Hazards for blasters include:

- A. Surges from drops of pressure in the hose line.
- B. Shocks from static electricity.
- C. Visual reduction from blasting hoods.

Slips, Trips and Falls:

Blast operators are exposed to tripping hazards and slippery work surfaces. High levels of airborne dust can obstruct the blasters vision.

Heat:

Blast operators are at a risk of heat-related illness due to the PPE that is worn, the work activity, or physical demands of the job and environmental conditions. This needs to be kept in mind to allow for sufficient breaks and liquid consumption. Training:

Training for employees engaged in blast operations includes:

- A. HazCom and SDS.
- B. Regulated areas.
- C. Detection of released of hazardous air-contaminants.
- D. Results of air sampling.
- E. Physical and health hazards along with symptoms. Proper PPE.
- F. Engineering controls, work practices and personal hygiene.

Aerial Lift Safety Policy

Introduction

Aerial lifts are commonly used in construction, inspection, and repair services to lift Alta Construction, Inc. employees to an elevated work position. Proper operation and use of aerial lifts can make completion of tasks at elevation, safer and more efficient. However, unsafe use, operation and aerial lift work practices can result in serious injury. This program has been developed due to the hazards associated with improper use and Alta's concern for the safety of individuals in and around this type of equipment. In addition, this program outlines general, operating, maintenance, inspection and training requirements governing safe aerial lift use at Alta Construction, Inc.

Purpose

All Alta Construction, Inc. employees must successfully complete a training program, and receive certification prior to the operation of any aerial lift. All Employees must comply with all aspects of this safety program. This program has been developed to reduce the risk of physical injury or property damage in areas where aerial lifts are in operation. It also brings Alta Construction, Inc. into compliance with OSHA requirements: OSHA Standard 29CFR1910.68, 29CFR 1926.453 and ANSI/SIA A92.6 - 2006

Procedures

3. Pre-Use Inspection

- a. Lift controls shall be tested each day prior to use to determine that such controls are in safe working condition. Tests shall be made at the beginning of each shift during which the equipment is to be used to determine that the brakes and operating systems are in proper working condition.
- b. Any safety defects (such as hydraulic fluid leaks, defective brakes, steering, lights, or horn, and/or missing fire extinguisher, seat belt, or back-up alarm) must be reported for immediate repair. They must also be locked and tagged, and taken out of service.

4. General Safe Work Practices

- a. Operators shall not wear any loose clothing or any accessory that can catch in moving parts.
- b. Before machine is started, the operator must walk completely around the machine to ensure everyone and everything is clear of the machine.
- c. Articulating boom and extendable boom platforms, primarily designed as personnel carriers, shall have both platform (upper) and lower controls. Upper controls shall be in or beside the platform within easy reach of the operator. Lower controls shall provide for overriding the upper controls. Controls shall be plainly marked as to their function. Lower level controls shall not be operated unless permission has been obtained from the employee in the lift, except in case of emergency.
- d. Modifications and additions that may affect the capacity or safe operation of an aerial/scissor lift are strictly prohibited without the manufacturer's written approval. Capacity, operation, and maintenance instruction markings will be changed as necessary if the manufacturer approves a modification.
- e. The insulated portion (if applicable) of an aerial/scissor lift shall not be altered in any manner that might reduce its insulating value.
- f. Any signs, plates, or decals which are missing or illegible must be replaced.
- g. If the aerial/scissor lift becomes disabled, a "out of service" tag or equivalent shall be attached to the controls inside the platform in a conspicuous location.
- h. Aerial/scissor lift devices with noted, reported deficiencies shall not be operated until repairs are made and equipment is authorized for use.
- . Operators must report all accidents, regardless of fault and severity, to their supervisor.

5. Safe Work Practices Before Operation

- a. Consideration shall be given to the amount of wind. Follow the manufacturer's instruction regarding operation in windy conditions. As a general rule aerial lifts shall not be operated in winds exceeding 25 mph although this can vary depending on the model of equipment. Supervisors have authority to ground lifts if they feel it is not safe.
- b. Guardrails must be installed and access gates or openings must be closed before raising the platform.
- c. Approved fall restraint system shall be worn while working from an aerial lift and the fall restraint system must be attached to the boom or basket.
- d. Boom and platform load limits specified by the manufacturer shall not be exceeded.

- e. Before moving an aerial lift for travel, the boom(s) shall be inspected to see that it is properly cradled and outriggers are in stowed position (if equipped).
- f. Consideration shall be given to the protection of bystanders via barricading, having another employee keep bystanders at a safe distance or by other means.
- g. Aerial lifts shall not be operated from trucks, scaffolds, or similar equipment.
- h. Attention shall be given towards the direction of travel, clearances above, below and on all sides. Minimum clearance between electrical lines and any part of the equipment is at least 10 feet.
- i. Employees shall not sit or climb on the guardrails of the aerial lift.
- j. Planks, ladders or other devices shall not be used on the work platform.
- k. An aerial lift shall not be moved when the boom is elevated in a working position with employees in the basket.
- l. Aerial lift shall not be placed against another object to steady the elevated platform.
- m. Aerial lift shall not be used as a crane or other lifting device.
- n. Aerial lift devices shall not be operated on grades, side slopes or ramps that exceed the manufacturer's recommendations.
- o. The brakes shall be set and outriggers, when used, shall be positioned on pads or a solid surface.
- p. Speed of aerial lift devices shall be limited according to the conditions of the ground surface, congestion, visibility, slope, location of personnel and other factors that may cause hazards to other nearby personnel.
- q. Stunt driving and horseplay shall not be permitted.
- Booms and elevated platform devices shall not be positioned in an attempt to jack the wheels off the ground.
- s. The area surrounding the elevated platform shall be cleared of personnel and equipment prior to lowering the elevated platform.
- t. All equipment must be secured on the inside of the aerial lift.
- u. Operators are to call for assistance if the platform or any part of the machine becomes entangled.
- v. The vehicle has a reverse signal alarm audible above the surrounding noise level or the vehicle is backed up only when an observer signals that it is safe to do so.

6. Safe Work Practices After Operation

- a. Safe shutdown shall be achieved by utilizing a suitable parking area, placing the platform in the stowed position, placing controls in neutral, idling engine for gradual cooling, turning off electrical power, and taking the necessary steps to prevent unauthorized use.
- b. Aerial lifts shall be shut off prior to fueling. Fueling must be completed in well ventilated areas free of flames, sparks or other hazards which may cause fires or explosions.

7. Changing and Charging Batteries

- a. Battery charging installations must be located in areas designated for that purpose.
- b. Facilities must be provided for: flushing and neutralizing spilled electrolyte, fire protection, protection of charging apparatus from damage by trucks, adequate ventilation for dispersal of fumes from gassing batteries.
- c. Precautions must be taken to prevent open flames, sparks, or electric arcs in battery charging areas.
- d. Employees charging and changing batteries shall be authorized to do the work, trained in the proper handling, and required to wear protective clothing, including face shields, long sleeves, rubber boots, aprons, and gloves.

8. Maintenance

- a. Any aerial lift not in safe operating condition must be removed from service. Authorized personnel must make all repairs.
- b. Repairs to the fuel and ignition systems of aerial lifts that involve fire hazards must be conducted only in locations designated for such repairs.
- c. Aerial lifts in need of repairs to the electrical system must have the battery disconnected before such repairs.
- d. Only use replacement parts that are currently recommended by the manufacturer.

Responsibilities

4. The Program Administrator: Larry Reeves, Micha Lamoreaux

- a. Must implement and administer the Aerial Lift Safety program.
- b. Review the Aerial Lift Safety program annually for compliance and effectiveness.
- Maintain written records of operator training on each model of aerial lift and the name of the trainer.
- d. Maintain written records of all inspections performed by the aerial lift owner, including the date any problems found, the date when fixed, and the name of the person performing the repairs.
- e. Maintain written records of the name and purchaser of each aerial lift.

5. Supervisors

- a. Coordinate employee training, and certify that all operators receive annual training.
- b. Ensure that only trained and qualified individuals use aerial lifts.
- c. Verify employee compliance with the principles and practices outlined in the Aerial Lift Safety Program.
- d. Provide specific operational training for each aerial lift.
- e. Observe the operation of aerial lifts, and correct unsafe practices.

6. All Employees

- a. Read the Aerial Lift Safety Program.
- b. Complete the Daily Pre-Use Inspection Checklist before operating any aerial lift.
- c. At least annually review the procedures outlined in this document.
- d. Observe the operation of the aerial lift, and report unsafe practices to your supervisor.

Training

Employees who are authorized to operate aerial lifts must receive training prior to engaging in their duties, and annually thereafter. The training is to ensure that the Aerial Lift safety Program is understood. The supervisor will also ensure that authorized aerial lift operators have acquired the necessary practical skills required for safe operation. Training is offered by certified trainers through Alta Construction, Inc. Certified trainers will perform an operational training with each employee to determine if operators have the knowledge, training, and skills necessary to use the aerial lift. Operational training will consist of a combination of general safety instruction, practical/operational training (demonstrations performed by the trainer, and practical exercises performed by the trainee), and evaluation of the operator's performance in the workplace. All operational training must be conducted under close supervision.

4. Initial Training

- a. Receive instruction on the intended purpose and function of each control.
- b. Prior to operating any Aerial Lift the trainee will read and understand the manufacturer's operating instruction(s) and aerial lift procedures, or receive training by a qualified person on the contents of the manufacturer's operating instruction(s) and users safety rules.
- Be informed of the Aerial Lift operating limitations and restrictions as defined by the manufacturer.
- d. Understand by reading or having a qualified person explain all decals, warnings and instructions displayed on the Aerial Lift.
- e. During operational training, trainees may operate a aerial lift only under the direct supervision of authorized trainers, and where such operation does not endanger the trainee or other employees.
- f. All training and evaluation must be completed before an operator is permitted to use an aerial lift without continual and close supervision.

5. Annual Training – must include at least the following

- a. Review of the Aerial Lift Inspection & Maintenance Record
- b. Review of Procedures
- c. Updated information on new Equipment.
- d. Review of Alta Construction, Inc.'s written program.

6. Training Records

Alta Construction, Inc. must maintain a record of all individual training, including:

- Subject of training
- Date of training
- Name of individual trained
- Name of authorized trainer
- Training records must maintained by Alta Construction, Inc. for a minimum of 3 years

Cold Weather Stress Policy

Preventing cold weather injuries and illnesses

During the winter months many workers face an additional occupational hazard. Exposure to cold. Some health problems can arise including frostbite, trench foot, and hypothermia. This policy is designed to provide employees basic information on how to prevent cold related injury and illnesses.

The Cold Environment

How the body responds to cold. An individual gains body heat from food and muscular work and loses it through convection, conduction, radiation, and sweating to maintain a constant body temperature of approximately 98.6 *F. The bod's first response to a cold environment is constriction of the blood vessels of the skin. That reduces heat loss from the surface of the skin by decreasing blood flow and/or shivering that generates heat by increasing the body's metabolic rate. Environmental conditions that cause cold-related stress are low temperature, cool high winds, dampness, and cold water. Wind chill (temperature and wind velocity) is an important factor to evaluate when working outside. For example, when the actual air temperature is 40*F and velocity of wind is 35mph exposed skin would perceive these conditions as the equivalent of 11*F. A dangerous situation of rapid heat loss for an employee exposed to high winds and cold temperatures. Alta Construction will do an assessment to identify the types of jobs and employees who are at risk for cold exposure.

Major Risk Factors

In addition to the cold environment, other major risk factors contributing to cold related stresses include inadequate clothing or wet clothing, drug use, certain medications, having a cold or other disease such as diabetes, atherosclerosis, and hyperthyroidism. Susceptibility also increases with age. Fatigue and being immobile also contribute as risk factors.

Harmful Effects of Cold

Common harmful effects of cold include frostbite, trench foot and hypothermia. Frostbite occurs when the skin tissue actually freezes and cell damage results. The freezing point of skin is approximately 30*F and wind chill can be a significant factor in accelerating the process. Fingers, toes, cheeks, nose, and ears are primarily affected. Alta Construction will train employees to administer the proper first aid for cold induced injuries and illnesses. Frostbite

The symptoms of frostbite include uncomfortable sensation of coldness. There may be a tingling, stinging or aching feeling followed by numbness. Initially the frostbitten area appears white and is cold to the touch. This is followed by heat, redness and swelling. Occasionally a victim may not be aware of the frostbite. Tissue damage can be mild and reversible or severe, resulting in scarring and tissue death. Amputation or loss of function can also be an unfortunate result. First aid includes treating the affected areas with warm water between 102*F and 110*F. Be careful to avoid rubbing frostbitten areas because this can lead to greater damage. If there is a chance of refreezing do not rewarm the affected areas.

Trench Foot

The condition is characterized by vascular damage. Symptoms include a tingling and / or itching sensation, pain and swelling. Blisters may form and be followed by death of skin tissue and ulceration. First Aid treatment for trench foot is similar to frostbite, and includes moving victim to warm area treating the affected area with warm water 102*F-110*F or warm packs. Arrange bed rest in warm environment and obtain medical assistance as soon as possible.

Trench Foot may be caused by long, continuous exposure to wet and cold environments or actual immersion in

Hypothermia

General hypothermia is the progressive loss of body heat with prolonged exposure to cold. Body heat loss is accelerated more rapidly when a person is wet. Most cases of hypothermia develop in air temperatures between 30 and 50*F, but significant hypothermia can occur with temperatures as high as 65*F if wet, or when in water at 72*F. The first symptoms of hypothermia are uncontrolled shivering and feeling cold. As the body's temperature continues to drop, an individual can become confused, careless and disoriented. At this point a person may make little or no effort to avoid further exposure to the cold. When the core body temperature falls below 86*F, the body's adaptive mechanisms for reducing heat loss become ineffective and death can occur.

Individuals experiencing mild hypothermia should be immediately moved to a warm dry shelter. Further heat loss is minimized by removing wet clothing and applying warm blankets for insulation. Warm, nonalcoholic, caffeine free drinks may be offered. More severe cases of hypothermia require medical attention as soon as possible.

Preventing Cold Related Disorders

Dress appropriately. Use a layering system. Inner layer of cotton or synthetic weave to allow ventilation and perspiration to escape. Middle layer of wool, down or synthetic pile to absorb sweat and retain insulating properties when wet. And an outer layer to break the wind and allow ventilation. Layering clothing allows for air pockets to form and retain body heat. It also allows you to adapt to changes in weather. Pay special attention to protecting feet, hands, head and face. Keep your head covered. Up to 40% of body heat can be lost when head is exposed. Fingers and hands can lose dexterity below 59*F. Wear foot gear that protects against cold and wet conditions. Footgear should be insulated and fit correctly. Safe Work Practices

Allow individuals to set their own pace and take extra work breaks when needed. Avoid activities, when possible, that may cause heavy perspiration. Shift as many outdoor activities to inside when feasible and work during warmest hours of day. Minimize activities that reduce circulation such as sitting or standing in a cold wet environment for long periods of time. Keep from getting dehydrated by drinking plenty warm caffeine free and nonalcoholic drinks. Allow a period of adjustment to cold before starting heavy work load. Avoid working alone and use the buddy system. Seek a warm shelter immediately if one or more of these symptoms are present. Heavy shivering, an uncomfortable sensation of coldness, severe fatigue or drowsiness. Regularly used walkways and travel routes should be sanded, salted or snow and ice removed as soon as possible. Cold weather supplies such as insulated gloves, hard hat liners, face and neck covers should be inspected regularly and replaced when necessary.

Worker Health and Education

Older worker and those with certain medical problems need to be extra alert about the effects of cold stress. Avoid using drugs and alcohol which may impair judgement while working in cold environments. Hypothermia commonly occurs in association with alcohol abuse. Educate employees with an initial training and then annual after that. Employees will be informed on the dangers of working around unstable snow and ice build up. Supervisor Responsibility

Supervisors should ensure that workers are equipped with and wear protective outerwear when necessary, implement work/warm-up schedules when indicated by the equivalent wind chill temperature chart. Upon observing, or being notified of, an employee experiencing the initial symptoms of frostbite or hypothermia, the supervisor is to ensure that the employee is moved to a warm location. If symptoms worsen or additional symptoms appear the supervisor will ensure that

employee is examined by medical professional. Supervisors will also make sure employees are under constant supervision in cold environments.

Employee Responsibility

It is employee's responsibility to wear the appropriate clothing and outerwear required to work in cold weather conditions. An employee experiencing any of the initial symptoms of frostbite or hypothermia must immediately move to a warm location and notify their supervisor of the symptoms. If symptoms worsen or additional symptoms appear, the employee must immediately seek medical attention

Heat Stress Policy

Policy Statement

Alta Construction developed this policy to protect employees from the hazards posed by working in the outdoor environment. Alta is committed to preventing heat related illnesses that can occur to employees working outside by:

- Identifying, evaluating and controlling potential exposure to extreme temperature, humidity and other environmental factors.
- Providing drinking water.
- Providing supervisor and employee training.
- Establishing heat-related emergency procedures.

Preventing Heat-Related Illnesses

This program applies when employees are exposed to outdoor heat at or above the following temperature and clothing action levels:

- Non-Breathing clothes including vapor barrier clothing or PPE such as chemical resistant suits. 52*F
- Double layer woven clothes including coveralls, jackets and sweatshirts. 77*F
- All other clothing. 89*F

Outdoor work includes any employee assigned to work in the outdoor environment on a regular basis. This program does not apply to incidental exposure which consists when an employee is not required to perform work activity outdoors for more than fifteen minutes in any sixty minute period. It is possible outdoor related illnesses might result at temperatures below the action levels when employees have not acclimated to sudden and significant increases in temperature and humidity. Supervisors and employees should monitor for signs and symptoms of heat related illness when there is a significant and sudden increase in temperature. Program Responsibility

Supervisors are responsible for encouraging employees to consume acceptable beverages (water and sports drinks that do not contain caffeine) to ensure hydration. Employees are responsible for monitoring their own personal factors for heat related illness including consumption of water or other acceptable beverages to ensure hydration.

Evaluating and Controlling Heat Stress Factors

In addition to temperature, supervisors should evaluate other potential heat stress factors before work begins.

These factors include:

- Radiant Heat. (Reflection of heat from asphalt, rocks, or composite roofing material and work in direct sunlight).
- Air Movement. (Wind blowing and temperature above 95*F).
- Conductive Heat. (Operating machinery).
- Workload Activity and Duration. (Heavy Manual Work).
- Personal Protective equipment. (Wearing a respirator, chemical resistant suits, and other heavy clothing).
- Personal Factors. (Not feeling well, age, weight and fitness level, drug and alcohol use, and previous heat illness).

Supervisors should attempt to control heat stress factors when feasible. Controls to consider include:

- Taking breaks in a shaded area.
- Starting work shift early and not working outside during hottest part of day.
- Removing Personal Protective equipment such as respirators and chemical resistant clothing.
- Using cooling vest or headbands.
- Workers should not work alone in the heat for long periods of time.

Drinking Water

Sufficient quantity of potable drinking water will be provided and made accessible to employees. At least one quart of water per employee per hour will be made available. If a potable water source is not available at worksite it is the supervisor's responsibility to ensure that one quart of water per hour is available to each employee.

Procedures for Responding to Heat-Related Illness

Supervisors will respond to heat-related illness in a quick safe manner. Below are potential types of heat-related illnesses, signs and symptoms and specific first aid and emergency procedures.

- Employees experiencing signs and symptoms of a heat-related illness are to stop work and report their condition to their supervisor.
- Employees showing signs or symptoms of heat-related illness are to be relieved from duty and provided sufficient means to reduce body temperature.
- Employees experiencing sunburn, heat rash, or heat cramps will be monitored to determine whether medical attention is necessary.
- Emergency medical services will be called (911) when employees experience signs and symptoms of heat exhaustion or heat stroke.

Sunburn:

Red hot skin possible blisters: Move to shade, apply cool compress or water get medical evaluation if severe.

Heat Rash:

Red itchy skin, bumpy skin, skin infection: Get out of sun keep affected area dry.

Heat Cramps:

Muscle cramps or spasms abnormal body posture: Drink water to hydrate body, rest in a cool shaded area, massage affected muscles get medical attention if cramps persist.

Heat Exhaustion:

High pulse rate, extreme sweating, pale face, insecure gait, headache, clammy moist skin, weakness, fatigue and dizziness: Call 911. Move to shade and loosen clothing, start rapid cooling with fan water mister or ice packs. Lay flat and elevate feet. Drink small amounts of water to hydrate and cool body.

Heat Stroke:

Any of the above but more severe, Hot dry skin, altered mental status with confusion and agitation, can progress to loss of consciousness and seizures: Call 911. Immediately remove

from work area, start rapid cooling with fan water mister or ice packs. Lay flat and elevate feet. If conscious give sips of water. Monitor airway and breathing, administer CPR if needed.

Heat Illness Training

Supervisor Training:

Prior to supervising employees working in an outdoor environment with exposure at or above action levels, supervisors will receive training in the following topics.

- The content and procedures contained in this program.
- Procedures listed in this program the supervisor will follow if an employee shows signs or symptoms consistent with possible heat-related illness.
- Information provided to employees.

Employee Training:

Employees who may be exposed to outdoor heat at or above the action levels are to be trained on the following topics:

- Environmental factors that might contribute to the risk of heat-related illness. (Temperature, humidity, radiant heat, air movement, conductive heat sources, activity level and duration and personal protective equipment).
- Personal factors that may increase susceptibility to heat-related illness. (Age, degree of acclimatization, medical conditions, drinking water, consuming alcohol, caffeine use, nicotine use and medication).
- The importance of removing heat retaining personal protective equipment during breaks.
- The importance of frequent drinking of small quantities of water.
- The importance of acclimatization.
- The different types and common signs and symptoms of heat-related illness.
- The procedure for immediately reporting signs and symptoms of heat-related illness in themselves and co-workers to their supervisor or person in charge.

Supervisors and employees covered by this program will receive annual refresher training.

Confined Space Program

Policy Statement:

It is the policy of Alta Construction to take every reasonable precaution to provide a safe work environment for its employees.

Entry into a confined space will be in compliance with all Federal and State laws and regulations as well as Alta Constructions confined space program.

Whenever possible, work that can be performed without entering a confined space is considered the preferred method.

Confined spaces that have been previously identified as non-permit required will automatically become a permit-required space if changes in conditions occur (e.g. flooding, reconfiguration, contamination).

A permit system has been established for all entries into permit required confined spaces. Permit forms will be kept at office and once completed will be kept on file for 1 year.

Prior to entry of a permit required confined space, an entry team consisting of at least one designated entrant, an attendant, and entry supervisor shall be established.

Atmospheric testing is required before entering any permit required space. If a hazardous atmosphere is present employees shall not enter until ventilation procedures have been carried out and testing reveals acceptable entry conditions. Whenever possible, all atmospheric hazards will be completely eliminated before entry. Testing will be conducted by using the appropriate gas detection meter that has been properly calibrated.

Alta Construction will provide all equipment required for entry in accordance with 29 CFR 1910.146 and will ensure that all affected employees are trained and use the equipment properly. All required equipment will be maintained according to manufacturer's recommendations.

Effective communication procedures will be established between the entry team and the rescue team prior to entry.

Training will be provided to employees of Alta Construction before they are assigned any duties related to permit required confined space entry.

All subcontractors who will be entering permit required confined spaces while working for Alta Construction will submit their confined space entry program, employee training documentation and will be required to adhere to the requirements of 29 CFR 1910.146.

This program shall be evaluated annually as well as on an as needed basis if any situation warrants the task.

Definitions:

Acceptable Entry Conditions: Conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit required space entry can safely enter and work within the space.

Affected Employee: Any employee that performs any work related to confined space entry. Attendant: An individual stationed outside a permit space who monitors the authorized entrants and performs all attendant duties assigned in program.

Authorized Entrant: An individual who is trained and authorized to enter permit required spaces. Blanking or Blinding: The absolute closure of a pipe, line or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is

capable of withstanding the maximum pressure of the pipe, line or duct with no leakage beyond the plate.

Confined Space: A space that:

- 1. Is large enough and so configured that an employee can bodily enter and perform assigned work; and
- 2. Has limited or restricted means of entry or exit (e.g. tanks, vessels, vaults, pits); and
- 3. Is not designed for continuous human occupancy.

Contractor: A non-Alta Construction employee being paid to perform work for Alta Construction.

Entry: The act by which a person intentionally passes through an opening into a permit required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space. Entry Permit: The written or printed document that is provided by the facility to allow and control entry into a permit space and that contains information specified in the confined space program.

Entry Supervisor: The person responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations and for terminating entry as required. The Entry Supervisor can also serve as an attendant.

Hazardous Atmosphere: An atmosphere that may expose employees to the risk of death, incapacitation, impairments of abilities to self-rescue (escape unaided from a permit space), injury or acute illness from one of the following:

- 1. Flammable gas, vapor or mist in excess of 10% of the Lower Flammable Level (LFL)
- 2. Airborne combustible dust at a concentration that meets or exceeds its LFL (can be approximated where the dust obscures vision at a distance of 5 feet or less)
- 3. Atmospheric oxygen concentration below 19.5% or above 23.5%
- 4. Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in 29 CFR 1910(g) or 29 CFR 1919(z)
- 5. Any other atmospheric condition that is Immediately Dangerous to Life or Health (IDLH)

Isolation: The process by which a permit space is removed from service and completely protected against the release of energy and material into the space by such means as blanking or blinding, misaligning or removing sections lines, pipes or ducts or by lock out tag out procedures of all sources of energy.

Non-Permit Confined Space: A space that does not contain or have the potential to contain any hazard capable of causing death or serious physical harm.

Permit Required Confined Space: A confined space that has one or more of the following.

- 1. Contains or has the potential to contain a hazardous atmosphere.
- 2. Contains a material that has the potential of engulfing an entrant.
- 3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section.
- 4. Contain any other recognized serious safety or health hazard.

Rescue Service: The personnel designated to rescue employees from confined spaces.

Retrieval System: Equipment used for non-entry rescue of persons from a confined space. Testing: The process by which atmospheric hazards that may confront entrants of a space are identified and evaluated. Testing includes specifying the tests that are to be performed in the space.

Vendor/Contractor: A non-Alta Construction employee being paid to perform a service for Alta Construction.

PURPOSE:

The provisions of this program require Alta Construction to provide the means, procedures, training and equipment to mitigate hazard and verify compliance through the use of a written program. The confined space program shall be available to all employees and their representatives for review.

Responsibilities:

Alta Construction: Is responsible for development and maintaining the confined space program. Alta Construction is responsible for providing a confined space training program for entrants, attendants and entry supervisors which will enable employees to recognize potential hazards and take the appropriate actions to control hazards. This training will be offered to all employees who have the potential to work in confined spaces. The confined space program shall be reviewed and updated annually.

Supervisors: are responsible for ensuring that the appropriate personnel receive and maintain required confined space training.

Employees: All Alta Construction employees shall comply with all procedures outlined in this policy. All employees must complete training as required by their supervisors and follow the procedures as outlined in this program when entering confined space. They should also assist in identifying potential confined space hazards.

Unauthorized entry into confined spaces shall be prevented. Prevention measures include training, signs, and security measures. All employees in or around confined spaces shall attend confined space awareness training.

Permit System

The permit process guides the entry team through a systematic evaluation of the space to be entered. The permit should be used to establish and document appropriate entry conditions. A confined space entry permit must be completed before approval can be given to enter a confined space. All members of the entry team are entitled to review the permit. A permit shall be kept at the job site for the duration of the job. Permits are only good for the specified duration, or an eight hour shift. Permits may not exceed the time required to complete the task. Once completed to entry supervisor must sign the permit to authorize entry. If a supervisor must be relieved of their duties, the permit shall be cancelled and a new permit must be filled out by the new entry supervisor. All entrants must exit the confined space and conditions must be reassessed. If circumstances cause an interruption in the work or a change in the alarm conditions for which entry was approved a new confined space permit must be completed. Permits must be kept for 1 year and will be kept on file at Alta Construction office. If hazardous conditions are found at a space or an incident has occurred a copy of the entry permit will be attached to the inventory documentation so that future entrants are aware of the hazards they may encounter. The entry supervisor shall terminate the permit when the operations are complete or if a condition arises that constitutes a new permit. Any such condition shall be documented on permit.. All expired permits shall be given to supervisors or Safety Manager. Duties of the Entry Team:

Entry teams must be established prior to entry and consist of at least one attendant, one entrant, and must have an entry supervisor.

Entry Supervisor: The Entry Supervisor will:

- 1. Know and understand the hazards that may be faced during entry, including information on the signs or symptoms and consequences of exposure.
- 2. Verify, by checking that the appropriate notations have been made on the permit, that all tests specified by the permit have been conducted, and that all procedures and equipment specified by permit are in place before endorsing the permit and allowing entry to begin.
- 3. Terminate the entry and cancel the permit when reasons for entering space have been completed or when an unacceptable condition within the space or outside the space is detected.
- 4. Verify that rescue services are available and that the means of calling the rescue service is operational. The entry supervisor will ensure that the attendant knows the method of summoning help if rescue is required. Self-Rescue and Non-Entry Rescue in addition to calling 911 will be used in instances when a rescue service is unavailable. When calling 911, inform dispatchers that incident contains a confined space.
- 5. Enforce this policy to ensure safe entry into any confined space.
- 6. Determine that throughout the entry process, all responsibilities and functions remain consistent with safety, regardless of production requirements, time or cost.
- 7. Have the authority to stop work if they feel that the entry is unsafe for any reason.
- 8. Be trained to the proper level of responsibility.

If an Entry Supervisor must be relieved at any point of the entry, the permit must be cancelled by said entry supervisor. All entrants must exit the space and the new Entry Supervisor must assess the space and conditions with the entry team and a new permit.

Entrant: All Entrants will know the following.

- 1. Verify that the rescue service is available and that the means of calling is operational.
- 2. Hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of exposure.
- 3. Proper use of equipment.
- 4. Means and methods of communication with attendant.
- 5. Signs and symptoms of exposure and conditions that would warrant an immediate evacuation.
- 6. When self- rescue must occur by means of an order by the attendant or entry supervisor, when symptoms or signs of exposure to dangerous hazard are experienced.
- 7. All entrants must be qualified for the task assigned inside the confined space(electrical, welding etc).

Attendants:

Alta Construction employees who have the responsibilities as attendants will only monitor 1 confined space at a time. Each confined space entry will have it's own attendant. Attendants will know the following:

- 1. Know the hazards that may be faced during entry or while in the space, including information on the mode, signs and symptoms and consequences of the exposure to suspected hazards.
- 2. Be aware of possible behavioral effects of hazard exposure in authorized entrants.
- 3. Continuously maintain an accurate count of authorized entrants in the permit space and ensure that the means used to identify authorized entrants is precise at all times.
- 4. Remain outside the permit space during entry operations until relieved by another authorized attendant.
- 5. Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space when conditions warrant an immediate evacuation.
- 6. Monitor 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:
 - a. If the attendant detects a hazardous condition.
 - b. If the attendant detects a change in the behavior of any authorized entrant which would suggest an exposure to a hazard.
 - c. If the attendant detects a situation outside the space that could endanger the authorized entrants.
 - d. If the attendant cannot effectively and safely perform all of the duties required as outlined in this policy.
- 7. Summon rescue and other emergency services as the attendant determines that that authorized entrants may need assistance to escape from permit space hazards.
- 8. Do the following when an unauthorized person(s) approach or enter a permit space while entry is underway.
 - a. Warn the unauthorized person(s) that they must stay away from the permit space.
 - b. Advise the unauthorized persons they must exit immediately if they have entered the permit space.
 - c. Inform the authorized entrants and the entry supervisor, if unauthorized persons have entered the permit space.
- 9. Perform non-entry rescue (rescue attempts that do not cause the attendant to break the plane of the entry to the space).

Preparation of the Space

- 1. An entry supervisor, attendants, and entrants will be assigned. All personnel involved with the entry and their representative, can observe all aspects of the preparation.
- 2. The entry supervisor will brief the entrants and attendants on all aspects of the job.
- 3. At any time, the entry supervisor, the entrant, and or the attendant can either postpone or stop the entry due to a safety concern.
- 4. The entry team will be provided and will wear all the appropriate personal protective equipment based upon the hazards present.
- 5. If the space is located on a roadway and will compromise traffic in any way, a temporary traffic control plan must be created and set up.

- 6. The Air monitor shall be properly calibrated according to manufacturer requirements and bump tested will occur prior to starting the monitoring process. Battery life will be checked and must be at full capacity. Air monitoring around the space is required prior to opening the space and must be documented on permit.
- 7. Any condition making it unsafe to remove an entrance cover shall be eliminated before the cover is removed.
- 8. Prior to opening the space, any entrances that will be open must be appropriately blocked to prevent accidental entry.
- 9. Upon opening the space, the oxygen content, flammable gases and vapors, and potential toxic air contaminants will be monitored and documented on permit using the provided gas monitors and without breaking the plane.
- 10. If a hazardous atmosphere exists, continuous forced air ventilation is required throughout the duration of the entry. Entrants may not enter space until acceptable entry conditions are confirmed. If acceptable entry conditions cannot be established and maintained, entry shall not be allowed.
- 11. All connecting lines, ducts, and pipes connected to chemical, gas and utility sources will be broken and capped or blanked.
- 12. Heating devices (e.g. jackets, coils, mantles, etc.) will be rendered safe either through line breaking/blanking or electrical lockout/tagout.
- 13. All mechanical, hydraulic and electrical hazards (agitators, pumps, machine drives), will be controlled by lockout/tagout.
- 14. If water has collected in space it will be pumped out before entry is made. If the source is a continuous flow a pump will be required to continuously remove water and must be watched closely by entry supervisor or attendant to make sure pump is working properly during the duration of the entry.
- 15. The space will be rinsed and dried if there is a buildup of hazardous or slippery material on the walls of the space.
- 16. The space will be cooled down to 110*F or less.
- 17. Adequate lighting will be provided either through low voltage lighting or through 110 volt plugged into a Ground Fault Circuit Interrupter (GFCI).
- **18**. All tools and communication devices shall be checked to make sure they are intrinsically safe if the potential exists for a flammable atmosphere.
- 19. Communication methods shall be established prior to entry between the entrant and attendant, and will be based on the size, location, and characteristics of the space.
- 20. If the selected device has batteries, the batteries must be fully charged.
- 21. The rescue service must be contacted before entry can take place.
- 22. All retrieval equipment must be inspected prior to entry. If there is a problem with any piece of equipment a supervisor must be notified and the equipment taken out of service.
- 23. For vertical entries the retrieval system will be set up at the entry point, and will include a tripod, winch with fall protection and full body harness with a retrieval line attached at the center of the entrants back near shoulder level above the entrants head.

- 24. If an entrant must unhook from the retrieval system for safety purposes, no hazardous atmosphere may exist and rescue team must be onsite.
- 25. If any other items such as tools need to be lowered into a space, a separate winch will be attached to the tripod and used for such purposes.
- 26. All required equipment for entry will be available at entrance.
- 27. Continuous space monitoring will be established by either attendant or entrant and will be documented every 15-30 minutes but no longer than 1 hour.
- 28. The attendant will stay in the immediate area of the entrance and will stay in contact with entrants.
- 29. The entry supervisor will formally approve the entry to begin.

Permit Completion

The permit will be completed by the entry supervisor. All information requested on the permit will be completed by the entry supervisor or NA (not applicable) will be written in. The time of the permit issuance will always be written in. In no case will a permit be valid for more than 8 hours. A new permit will be issued if job takes longer. Expired permits will be return to office. The entry permit will be closed out by listing the time of space exit and any other pertinent information. The rescue service will be notified that the entry is complete. Entry closure will be replaced. Blanked and capped piping, tubing, ducts etc. will be reattached. Lockout/tagout will be removed. All entry and safety equipment will be cleaned inspected and returned to storage areas.

Equipment Maintenance

- 1. All confined space equipment shall be maintained in accordance of manufacturer requirements.
- 2. All equipment shall be inspected prior to each use and at the end of each use. Any equipment that does not pass inspection shall be taken out of service and supervisor notified.
- 3. It is the responsibility of the supervisors to ensure that all equipment is properly maintained.

Training:

Training will be provided for all personnel who are attendants, entrants or entry supervisors as follows.

- 1. Before the employee is assigned duties relating to confined space entry.
- 2. Before the employees assigned duties change.
- 3. Whenever there is a change in operations that presents a hazard that the employee has not been previously trained.
- 4. Whenever there is an indication that the procedure is not being followed safely and/or when there are indications that employee practices or knowledge do not meet requirements.

Training shall establish proficiency in the duties required by the standard. All training will be certified in writing with the employee's name and date of training.

Emergency Action Plan

Alta Construction 17 Smithsfork Way Lyman, Wyoming

Evacuation Routes:

Evacuation routes should be posted in each area. The following information is marked on evacuation maps:

- 1. Emergency exits.
- 2. Evacuation routes.
- 3. Locations of fire extinguishers.
- 4. Assembly points.

Site personnel should know at least two evacuation routes.

Emergency Phone Numbers

Fire Department: 911 Ambulance: 911

Police: 911

Stu Hickman- President- Cell- 307-780-5306 Tom Hickman- Vice President- Cell 307-780-5308

Non-Emergency Phone Numbers

Sheriffs Office:

- 1. Evanston- 307-783-1000
- 2. Bridger Valley- 307-782-7432
- 3. Sweetwater County- Rock Springs 307-352-6800
- 4. Sweetwater County- Green River- 307-872-6350

Fire Department:

- 1. Mountain View- 307-782-3118
- 2. Lyman- 307-787-6313
- 3. Evanston- 307-783-1000
- 4. Green River- 307-872-0543
- 5. Rock Springs- 307-362-9390

Hospitals and Clinics:

1. Evanston: 800-244-3537

Kemmerer: 307-877-4401
 Rock Springs: 307-362-3711

4. Lyman: 307-787-3313

5. Mountain View: 307-782-3414

Utility Company

Electric: 307-786-2800 Water: 307-782-3130 Telephone: 307-782-6131 Types of Emergencies to be reported by Alta Construction employees may include but are not limited to:

- 1. Medical
- 2. Fire
- 3. Chemical Spills
- 4. Explosions
- 5. Bomb Threats

Voice communication will be utilized to notify employees of emergencies.

Fire Emergency

When a fire is discovered notify Fire Department by calling 911. Notify all site personnel of fire emergency. Fight the fire ONLY if:

- 1. The fire Department has been notified.
- 2. The fire is small and is not spreading to other areas.
- 3. Escaping the area is possible by backing up to nearest exit.
- 4. Fire extinguisher is in working condition and employee is trained to use it.

Upon being notified of a Fire Emergency, occupants must:

- 1. Leave the building using designated escape routes.
- 2. Assemble in the designated area. (East Parking Lot).
- 3. Remain outside until All clear has been issued.

Supervisors must:

- 1. Coordinate an orderly evacuation of personnel.
- 2. Perform an accurate head count of personnel in their Area.
- 3. Provide Fire Department personnel with the necessary information about the facility.
- 4. Ensure that all employees have evacuated the area.
- 5. Report any problems to Emergency Coordinator at assembly area.

Medical Emergencies

In The event of a medical emergency call 911 and provide the following information:

- 1. Nature of emergency.
- 2. Location of emergency (address, building, room # etc).
- 3. Your name and phone number from which you are calling.
- 4. Any other information requested by emergency personnel.

Do not move victim unless absolutely necessary. Provide First Aid if trained to do so.

Natural Disasters

Earthquake:

- 1. Stay Calm, Keep away from overhead fixtures, windows, filing cabinets and electrical power.
- 2. Assist people with disabilities to find a safe place.

3. Evacuate as instructed by designated official or supervisor.

Floods:

If indoors: Be ready to evacuate as directed by designated official, follow recommended evacuation routes.

If outdoors: Climb to higher ground and stay there. Avoid walking through flood water. If car stall, abandon it immediately and climb to higher ground.

Tornado: When a warning is issued, seek shelter inside.

Consider the following:

1. Small interior rooms on the lowest floor and without windows, hallways on the lowest floor away from doors and windows. Rooms constructed with reinforced concrete, brick or block with no windows.

Stay away from outside windows and walls. Use arms to protect head and neck. Remain sheltered until threat is over.

Training:

Alta Construction will train employees on Emergency Action Plan during initial orientation and also if there are any changes in procedure or building design.

Excavation and Trenching Policy

Purpose:

Alta Construction strives to provide a safe work environment for its employees. This policy provides information to the employees on excavating and trenching.

Scope:

This policy applies to all Alta Construction employees exposed to excavating and trenching hazards while performing work functions.

Responsibilities:

Supervisors:

It is the supervisor's responsibility to comply with and ensure that this procedure is followed, that appropriate equipment for safe operations is provided, that employees are familiar with the requirements of this policy and the hazards of trenching and excavation, and operations are conducted in a safe manner and within applicable local, state and federal regulations.

Employees:

Employees are responsible for complying with this policy.

Definitions:

Competent Person- One who is capable of identifying existing and predictable hazards in the surroundings, or working conditions, which are unsanitary, hazardous, or dangerous to employees and who has the authorization to take prompt corrective measures to eliminate them. Excavation- Any man made cut, cavity, trench or depression in an earth surface, formed by earth removal.

Trench- The depth of the hole is greater than the width.

Locating Underground Utilities:

- 1. Underground utility marking (e.g. Sewer, telephone, gas, electric) must be requested in accordance with local, state and federal regulation prior to the commencement of any excavation.
- 2. Expiration of locates will vary from state to state. It is the responsibility of the supervisor to be aware of expiration dates to ensure compliance.

Safety Related Equipment at Job Site:

- 1. Fire extinguishers
- 2. First aid kits
- 3. SDS's for any chemicals that are on jobsite
- 4. Any Permits required by Client.
- 5. Manufacturer's tabulated data for any shoring or shielding equipment.

Personal Protective Equipment

- A. Hard hat is required unless employee is in cab of equipment that is protected by overhead guard.
- B. Safety Toed Safety Shoes.
- C. High Visibility safety vest is required for all workers when exposed to traffic.
- D. Safety Glasses.
- E. Hearing Protection whenever an employee is exposed to high noise levels exceeding 85 decibels.

Work Zone Traffic Control

- A. Must be used at all work sites in or near the street.
- B. Must be utilized for short duration intermediate duration and long duration work.
- C. Must be clearly visible to vehicular traffic as it approaches the work site.

Working near overhead powerlines

A minimum distance of 10 feet must be maintained between workers, equipment and energized overhead power lines up to 50k V (50,000 volts). For overhead power lines, exceeding 50k V, the required clearance distance is 10 feet plus 4 inches for every 10k V above 50k V.

- 1. Use a spotter to ensure clearances are maintained during operation of digging and lifting equipment.
- 2. If the minimum distances cannot be maintained, contact utility owner and have them deenergize the power lines and provide grounding equipment as needed.
- 3. If the utility owner does not provide grounding equipment, do not stand near the grounding location for intentionally grounded vehicles when contact with overhead wires is possible. Use insulation and barriers to protect employees from grounding area.
- 4. When needed to guide or steady a hoisted load, non-conductive tag lines shall be used to keep employees clear of the load.

Soil Classification:

Soil classification must be determined by testing and protective systems are to be designed according to soil classification.

- 1. Stable Rock- Natural solid mineral matter that can be excavated with vertical sides and remain intact while exposed.
- 2. Type A- Cohesive soils with unconfined compression strength of 1.5 tons per square foot or greater (example: most types of clay).
- 3. Type B- Cohesive soil with unconfined compression strength greater than 0.5 tons per square foot, but less than 1.5 tons per square foot (example: angular gravel, similar to crushed rock, rock that is not stable).
- 4. Type C- Cohesive soil with unconfined compression strength of 0.5 tons per square foot or less (example: sand).

Note: Soil classification must be reevaluated following every rain storm or other event which could weaken soil.

Cave-in Protection

This is the most important safeguard associated with digging activities. It is of utmost importance to protect employees from cave-in. One cubic yard of soil is equivalent to approximately 2,700 pounds of force.

- A. Sloping- Method of protecting employees by excavating to form sides of an excavation or trench that are inclined away from the hole. Sloping systems must be designed in accordance with OSHA requirements.
- B. Benching- Method of protecting employees by excavating the sides of an excavation or trench to form one or more horizontal levels of steps, usually with vertical or near vertical surfaces between levels. Benching systems must be designed in accordance with OSHA requirements and is not allowed inn Type C soil.
- C. Shoring- An engineered system, usually comprised of aluminum hydraulic cylinders (crossbraces) used in conjunction with vertical rails (uprights) or horizontal rails (walers). Such systems are designed specifically to support the sidewalls of an excavation. Plywood or sheeting used must be approved by the manufacturer and specified in the tabulated data.
- D. Trench Shields/Box- A structure that is able to withstand the forces imposed on it by a cave-in and protect employees within the structure. Shields can be permanent structures of can be designed to be portable and move along as work progresses. Additionally, shields can be either pre-manufactured or job built in accordance with manufacturers specifications.
- E. Combination- Utilizing any two or more of the previously mentioned methods to ensure sufficient cave-in protection.

Trench Shield Requirements:

- 1. Trench shields and other manufactured shoring/shielding equipment must be installed in accordance with Manufacturers Tabulated Data.
- 2. Trench shields shall be installed in a manner to restrict lateral or hazardous movement of the shield in the event of a sudden soil shift. Lateral/horizontal movement can be negated by backfilling soil to lessen the gap between the sides of the shields and the edge of excavation.
- 3. Excavation of material to a level no greater than 2' below the bottom of a support system shall be permitted when allowed by the tabulated data.

Angles of Repose for sloping protection:

- 1. Type A soil- ³/₄' horizontal to 1' vertical.
- 2. Type B soil- 1' horizontal to 1' vertical.
- 3. Type C soil- 1.5' horizontal to 1' vertical.

Means of Egress Within Excavations:

- 1. A stairway, ladder, ramp or other safe means of egress must be located in trenches/excavations that are 4' in depth or greater and must be located within 25' of lateral travel for employees.
- 2. Ladders, when used as the means of egress, must be extended a minimum of 3' above the top edge of the excavation and must be secured from tipping.

Surface Encumbrances, Adjacent Structures, and Access Around Excavation:

Surface encumbrances and adjacent structures (e.g. street lights, poles, and trees) that are located so as to create a hazard must be removed and or supported.

Fall Protection- where applicable.

Walkways shall be provided where employees or equipment are required or permitted to cross over excavations. Guardrails which comply with 1926.502(b) shall be provided where walkways are 6 feet or more above lower levels.

No employee shall be permitted underneath loads handled by lifting, hoisting or digging equipment.

When mobile equipment is operated adjacent to an excavation, and the operator does not have a clear view of the edge, a warning system shall be utilized such as barricades, hand signals, and or stop logs.

Hazardous Atmospheres:

Where oxygen deficiency or a hazardous atmosphere exists or could reasonably be expected to exist, the atmosphere in the excavation shall be tested before employees enter excavations greater than 4' in depth.

Employees shall not work in excavations in which there is accumulated water or in which water is accumulating, including runoff from rain storms, unless adequate precautions (pumping activities) have been taken to protect employees.

Inspections:

Daily inspections of excavations, the adjacent areas and protective systems shall be made by the competent person. These inspections shall be performed prior to the start of work and as needed throughout the job. Inspections shall also be made after every rainstorm or other hazard increasing event.

Where the competent person finds evidence of a situation that could result in possible cave-in, indications of failure of protective systems, hazardous atmospheres or other hazardous conditions, exposed employees shall be removed from the hazardous area until the necessary precautions have been taken to ensure their safety.

After Hour Protection:

Unless prohibited, all trenches/excavations must either be backfilled or plated in accordance with local or state regulations. In addition, traffic cones, warning lights, barricades, caution/warning tape may be required as additional safe guards to protect excavated area.

Training:

All Alta Construction employees working in trenches and excavations must receive initial, excavation safety training before engaging in excavation activities. Refresher training will be conducted regularly and when new hazards are introduced, procedures have changed, or the employees actions or behavior evidences a need for refresher training.

Flammable and Combustible Liquids

Purpose:

This program applies to all Alta Construction employees. When work is performed on a non-owned or operated site the operator's program shall take precedence, however this document covers Alta Construction employees and contractors and shall be used on owned premises, or when operator's program doesn't exist or is less stringent.

Definitions:

- A. Closed container- A container as herein defined, sealed by means of a lid or other device that neither liquid nor vapor will escape from it at ordinary temperatures.
- B. Combustible liquid- any liquid having a flash point at or above 100*F. Combustible liquids shall be divided into two classes as follows.
 - 1. Class II liquids shall include those with flashpoints at or above 110*F and below 140*F except any mixture having components with flashpoints of 200*F or higher, the volume of which make up 99% or more of total volume.
 - 2. Class III liquids shall include those with flashpoints at or above 140*F. Class III liquids are subdivided into two subclasses.
 - a. Class IIIA liquids shall include those with a flashpoint at or above 140*F and below 200*F except any mixture having components with flashpoints of 200*F, or higher, the total volume of which make up 99% or more of the total volume of mixture.
 - b. Class IIIB liquids shall include those with flashpoints at or above 200*F.
- C. Flammable Liquid- any liquid having a flashpoint below 100*F except any mixture having components with flashpoints of 100*F or higher, the total make up 99% or more of the total volume. Flammable liquids shall be known as class I liquids and are divided into three classes as follows.
 - a. Class IA shall include liquids having flashpoints below 73*F and having a boiling point below 100*F.
 - b. Class IB shall include liquids having flashpoints below 73*F and having a boiling point at or above 100*F.
 - c. Class IC shall include liquids having flashpoints at or above 73*F and below 100*F.

REFER to SDS sheets "flashpoint" to determine the flammable class rating.

- D. Container- Any barrel, can or drum.
- E. Flashpoint-The minimum temperature at which a liquid gives off vapor in sufficient concentration to form an ignitable mixture with air near the surface of the liquid.
- F. Portable Tank- A closed container having a liquid capacity of over 600 gallons and not intended for fixed installation.

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- G. Safety can- An approved container, of not more than 5 gallons capacity, having a spring closing lid and spout cover and so designed that it will safely relieve internal pressure when subjected to fire exposure.
 - 1. Ventilation as specified in this section is for the prevention of fire and explosion. It is considered adequate if it is sufficient to prevent accumulation of significant quantities of vapor-air mixtures in concentration over ¼ of the lower flammable limit.

Responsibilities:

Supervisors:

- A. Ensure all employees are trained to work with and handle flammable and combustible liquids properly and safely.
- B. Ensure that proper storage, labeling and personal protective equipment are provided to employees required to work with flammable and combustible liquids.

Employees:

- A. Ensure that all flammable and combustible liquids are stored in approved containers, labeled and put in proper storage after each use or at the end of every shift.
- B. Wear any additional PPE that may be needed for their protection, and to clean up any spills promptly and report spills to supervisor.

Requirements:

General:

- 1. Only approved containers and portable tanks shall be used for storage and handling of flammable and combustible liquids.
- 2. Flammable and combustible liquids shall not be stored in areas used for exits, stairways or normally used for sage passage of people.
- 3. All containers shall be labeled identifying content and hazards.
- 4. All indoor storage rooms, cabinets and buildings shall have adequate ventilation to the outside.
- 5. All connections and lids used in handling flammable and combustible material shall be tight to prevent any release of liquid or vapor.
- 6. Fire extinguishers shall be provided as required.
 - a. At least one portable fire extinguisher, having a rating of not less than 20B units, shall be located outside of, but not more than 10 feet from the door opening into any room used for storage of more than 60 gallons of flammable and combustible liquids.
 - b. At least one portable fire extinguisher having a rating of not less than 20B units shall be located not less than 25 feet, nor more than 75 feet from any flammable liquid storage area located outside.
 - c. At least one portable fire extinguisher having a rating of not less than 20BC units shall be provided on all vehicles used for transporting and/or dispensing flammable or combustible liquids.

7. The quantity of flammable or combustible liquids removed from storage for use shall not exceed the needed supply for that shift.

Indoor Storage of flammable and combustible liquids:

- 1. No more than 25 gallons of flammable or combustible liquids shall be stored in a room outside of an approved storage cabinet.
- 2. Quantities of flammable and combustible liquids in excess of 25 gallons shall be stored in acceptable or approved fire resistant cabinets.
 - a. Cabinets shall be labeled in conspicuous lettering, "Flammable Keep Fire Away".
 - b. Not more than 60 gallons of flammable or 120 gallons combustible liquids shall be stored in any one storage cabinet. No more than three such cabinets maybe located in a single storage area.
 - c. All approved storage cabinets shall be vented upwards and to the outside of the buildings. Vent pipes shall be supported and not allowed to reduce in size coming out of cabinets.
 - d. Conspicuous and legible signs prohibiting smoking and open flames shall be posted.
 - e. Storage cabinets must be locked when unattended and are not permitted in hallways and walkways.

Storage rooms and Building construction:

The inside of storage rooms or self-contained storage buildings shall be constructed to meet the required fire-resistive rating for their use.

- 1. Where automatic extinguishing system is provided, the system shall be designed and installed in an approved manner.
- 2. Openings to other rooms or buildings shall be provided with noncombustible liquid-tight raised sills or ramps at least 4 inches in height or the floor of the storage area shall be at least 4 inches below the surrounding floor.
- 3. Openings shall be provided with approved self-closing fire doors.
- 4. The room shall be liquid-tight where the walls join the floor. A permissible alternate to the sill or ramp is an open-grated trench, inside the room, which drains to a safe location.
- 5. Wood of at least 1 inch nominal thickness may be used for shelving, racks, scuff boards and floor overlay.

NOTE: Fire protection system shall be sprinkler, water spray, carbon dioxide or other system approved by a nationally recognized testing laboratory for this purpose.

- 6. Electrical wiring and equipment located inside storage rooms shall be approved for Class I, Division I, hazardous locations.
- 7. Every inside storage room shall be provided with either a gravity or mechanical exhausting system.

- A. Such a system shall commence not more than 12 inches above floor and be designed to provide a complete change of air within the room at least 6 times per hour.
- B. If a mechanical exhausting system is used, it shall be controlled by a switch located outside the door.
- C. The ventilation equipment and any lighting fixture must be operated by same switch.
- D. Where gravity ventilation is provided, the fresh air intake, as well as the exhausting outlet from the room, shall be on the exterior if the building in which the room is located.
- E. In every inside storage room one clear aisle at least 3 feet wide must be maintained.
- F. Containers over 30 gallons capacity shall not be stacked upon each other.

Flammable and combustible liquids in excess of that permitted in inside storage rooms must be stored outside of buildings.

Outside storage of flammable and combustible liquids:

- 1. Storage containers (not more than 60 gallons each), shall not exceed 1,100 gallons in any pile or area.
 - a. Piles or groups of containers shall be separated by a 5 foot clearance.
 - b. Piles or groups of containers shall not be nearer than 20 feet to a building.
- 2. There shall be a 12 foot wide access area leading to all outside storage areas to permit room for fire control apparatus.
- 3. The storage area shall be graded in a manner to divert possible spills away from buildings or other exposures, or shall be surrounded by a curb or earth dike at least 12 inches high.
 - a. When curbs or dikes are used, provisions shall be made for draining off accumulations of ground or rain water, or spills of flammable or combustible liquids.
 - b. Drains shall terminate at a safe location and shall be accessible to operation under fire conditions.

Outdoor portable tank storage:

- 1. Portable tanks shall not be nearer than 20 feet from any building.
 - a. Two or more portable tanks, grouped together, having a combined capacity in excess of 2,200 gallons shall be separated by a 5 foot clear area.
 - b. A 5 foot clear area shall separate individual portable tanks exceeding 1,100 gallons.
- 2. Storage areas shall be kept free of weeds, debris, empty and full drums and other combustible material not necessary to the storage.
- 3. Portable tanks exceeding 660 gallons shall be provided with emergency venting devices.
- 4. Conspicuous and legible signs prohibiting smoking and open flame shall be posted.

Dispensing flammable and combustible liquids:

- 1. Transfer of flammable liquids from one container to another shall be done only when containers are electrically interconnected (bonded) and grounded.
- 2. Transferring by means of air pressure on the container or portable tanks id prohibited.
- 3. Dispensing devices, hoses and nozzles for flammable liquids shall be of an approved type for the material being dispensed.
- 4. Conspicuous and legible signs prohibiting smoking and open flames shall be posted.

Handling Liquids at point of final use:

- 1. Flammable liquids shall be kept in closed containers when not immediately inn use.
- 2. Leakage or spillage of flammable or combustible liquids shall be cleaned up and disposed of promptly.
- 3. Flammable liquids can only be used where there are no open flames or other sources of ignition within 50 feet of the operation, unless conditions warrant greater distance.

Service and refueling areas:

- 1. Flammable or combustible liquids shall be stored in approved closed containers, in tanks located underground or in above ground portable tanks.
- 2. The dispensing nozzle shall be an approved automatic-closing type without a latch-open device.
- 3. There shall be no smoking or open flames in the areas used for receiving and dispensing of flammable or combustible liquids, or servicing fuel systems for internal combustion engines.
 - a. Conspicuous and legible signs prohibiting smoking shall be posted.
- 4. The engines of all equipment being fueled shall be shut off during fueling operations.
- 5. Each service or fueling area shall be provided with at least one fire extinguisher having a rating of not less than 20BC located so that an extinguisher will be within 75 feet.

Personal Protective Equipment:

Additional protective equipment may be required in addition to Alta Construction minimum requirements. Refer to the SDS sheets for further guidance and requirements.

A. Examples- Face Shield, Googles and approved style and type of gloves.

Control of Ignition Sources:

Precautions shall be taken to prevent the ignition of flammable vapors. Ignition sources include but are not limited to the following:

- a. Open Flames
- b. Lightning
- c. Hot surfaces
- d. Radiant heat
- e. Smoking
- f. Cutting and Welding

- g. Spontaneous Ignition
- h. Frictional Sparks
- i. Static electricity
- j. Electrical sparks
- k. Ovens, furnaces and other heating equipment

Static Electricity:

- A. All equipment such as tanks, machinery and piping shall be designed and operated to prevent electrostatic ignitions.
- B. All metallic equipment where an ignitable mixture could be present shall be bonded and grounded.
- C. The bond ground or both shall be physically applied or shall be inherently present by the nature of the installation.
- D. Any electrically isolated section of metallic piping or equipment shall be grounded to prevent hazardous accumulation of static electricity.

Training:

- A. All employees that may be exposed to flammable and combustible liquids shall receive awareness training of this topic.
- B. In addition, employees shall receive the following training and information regarding flammable and combustible liquids.
 - 1. HazCom Training
 - 2. Fire Safety and Extinguisher Training.
 - 3. Emergency Action Plan
 - 4. Fire Prevention Plan

Hand and Portable Power Tool Policy

Alta Construction strives to provide a safe work environment. This policy will provide information on the safe use of hand and portable power tools.

Alta Construction requires that hand and portable power tools be purchased, maintained and used by qualified personnel who understand the limitations and requirements for the safe use of such tools.

This policy applies to all Alta Construction employees who use and maintain portable hand and power tools.

Responsibilities:

Management/Supervisors

- A. Purchase only those tools that have been listed by a Nationally Recognized Testing Laboratory (NRTL) such as Underwriter's Laboratory (UL).
- B. Conduct a visual inspection of tools prior to use.
- C. If Testing is required (e.g. GFCI testing before each use) procedures will be in place to ensure compliance.
- D. Ensure that employees using tools understand and follow manufacturer's instructions, routinely inspect tools, and use them only for the purpose for which they were designed.
- E. Be aware of and make available, as appropriate, ergonomically designed tools for repetitive tasks and for those jobs for which a job safety analysis indicates a need for such tool.
- F. Ensure that a maintenance program is in place to identify and repair defective or unsafe tools. Repairs to portable electrical tools may only be made by an authorized manufactures tool service/ repair group or by approved company sources.
- G. Training will take place during new employee orientation and with other recognized training forums.
- H. Employees who indicate they have had prior training will be required to demonstrate understanding and capabilities of tool prior to being assigned to work.
- I. Retain manufacturer's instructions for training/ reference purposes.
- J. Ensure that periodic assessments and inspections of tools and tool use are performed.

Employees:

- A. Attend training as needed or required for tool use.
- B. Report incidents, accidents and signs or symptoms of injury to supervisor.
- C. Do a visual inspection of tools before use.

Procedure:

- A. All tools shall be maintained in a safe condition.
- B. No one will use an unsafe/defective tool. Tools that are damaged or defective will be removed from service.

- C. Hand and power tools that may generate sparks or high temperatures will not be used in hazardous atmospheres. A gas detection monitor may be needed to verify this.
- D. Only qualified and trained personnel will operate powder-actuated tools.
- E. Before starting a job the supervisor will ensure that the employee is fully aware of the hazards associated with the particular tool to be used.
- F. Ground Fault Circuit Interrupter (GFCI) protection will be provided and used for all power tools.
- G. Double insulated tools do not require and equipment grounding conductor but they still require GFCI protection.
- H. Modifications will not be made to any tool or related equipment. Follow manufacturer or company instructions when repairs are needed.
- I. Do not abuse power cords or hoses. Never carry tool by cord or hose or yank to disconnect. Protect cords from heat, oil and sharp edges.
- J. Cords and hoses will be routed in such a manner as to not create a tripping hazard.
- K. The use of any machinery, tool, material or equipment which is not in compliance are prohibited. They shall be identified unsafe by tagging and locking controls to make inoperable or shall be physically removed from place of operation.
- L. Where tools are used which could present a hazard to anyone other than the user, all other employees will be instructed on hazards.
- M. Tools having an identification number will be checked for legibility.
- N. Use the right tool for the job.
- O. Tools producing 100dB (A) of noise will be labeled with a "Hearing Protection Required" sticker or tag.
- P. Remove adjusting keys and wrenches before connecting to power supply.

Safety:

- A. Dress appropriately for job.
- B. Do not wear loose clothing or dangling jewelry.
- C. Confine long hair in a hair-net, cap or secure to back of head.
- D. Use care when wearing gloves. Wet and slippery, getting entangled in tool.
- E. Safety glasses are the minimum requirement when using any tool, additional PPE requirements may be necessary depending on which tool is to be used and job application(e.g. face shield, side shields, FRC, goggles etc.).
- F. Hearing protection if required.
- G. Keep cutting tools sharp and replace when necessary.
- H. Never use fingers to pull or dislodge chips or turnings from tools or parts.
- I. Make sure air powered tools are hooked up to proper lines supplied for that purpose.
- J. Do not set down or carry a tool in any way so that the starting button can be accidentally struck.
- K. Work will be secured with clamps or vice when possible to free both hands to use tool.

Guarding:

One or more methods of guarding will be provided where required to protect the operator and other employees in the area from hazards created by tool use. Examples of guarding methods are barrier guards, two hand tripping devices, electronic safety devices. The guard shall not create a hazard in itself. Inspect tools without guards for signs of guard removal. If it's evident a guard has been removed, tag out tool and get a replacement guard. Never remove a guard during use of tool.

Training:

Employees will be trained on specific tools on an as needed basis. Retraining will be provided whenever there is a change in employee's job assignments, a change in the type of tool used and if a new hazard is added to the work environment.

Ladder Safety Policy

Applicability:

This policy applies to all Alta Construction employees who use portable ladders.

Purpose and Scope:

This policy describes how portable ladders are to be selected, used, inspected and maintained.

Implementation:

Safe ladder usage is the responsibility of each employee. This includes selection, inspection, and correct use, as well as reporting unsafe conditions to supervisor. Supervisors are responsible to ensure their employees are provided safe, serviceable, and appropriate type ladders as well as the necessary training to use them correctly.

Requirements:

A. Ladder Selection:

Different ladders are made for specific uses. For a given task, you must select the proper ladder to ensure safety. Consideration must be given to the working height, capacity, type placement and condition of ladder for your work.

Prior to purchase check with supervisor for correct specifications.

B. Step Ladders:

These are self-supporting ladders with flat steps and hinged backs. They may be constructed of aluminum, fiberglass or wood. They must have a metal spreader that locks the ladder open. They should only be used on firm level surfaces. The maximum allowable length of a step ladder is 20 feet. These must never be used as a straight type ladder (leaned up against a wall for use) as they were not designed for safe use in this manner. Never sit or stand on the top two steps of a step ladder. A longer ladder may be required to safely perform a given task.

C. Straight type ladders:

These are not self-supporting ladders. They must be leaned up against a stable surface, with a 1:4 scope (1 foot away from the wall for every 4 feet in height). They may be constructed of aluminum, fiberglass or wood, in either single or extendable lengths. The maximum allowable length for a single ladder is 30 feet, while extension ladders may reach up to 72 feet. Both should be placed on firm, stable footings or utilize leg extensions or non-slip feet. Straight type ladders should extend at least 3 feet above the accessed area, and be tied off to secure anchor point. If unable to reach 3 feet above the accessed point a grabrail shall be provided to assist employees mounting and dismounting ladder.

USE:

- A. Ladders shall only be used for the purpose they were designed. Never use a ladder unless you have been trained.
- B. Always use three points of contact when using ladders (e.g. two feet one hand).
- C. Always face ladder when ascending or descending.
- D. Ladders shall not be loaded beyond maximum manufacturer rated capacity.
- E. Portable ladders are to only be used by one person at a time, unless specifically designed otherwise.
- F. Protect the base of ladders in high traffic areas. If you musty close an area due to safety concern, barricade access routes and post alternatives, as appropriate. If you cannot close an area, you must have another employee guard ladder base.
- G. Make sure ladder rungs are clear of mud and debris before using. Make sure rungs, steps and cleats are parallel, level and uniformly spaced when ladder is in position for use. Meet all spacing and clear width / distance requirements. They must also be shaped such that employees feet cannot slip off the end of the rungs and corrugated, knurled, dimpled, coated with skid-resistant material or otherwise treated to minimize slipping.

Prohibited Actions:

- A. Never carry awkward loads while using a ladder. Use ropes to haul heavy items up once you have reached your working height or surface.
- B. Never place tools or supplies on ladder steps if they could fall. Many injuries are caused by falling objects.
- C. Never used wood or metal ladders around exposed, energized electrical equipment. Ladders can provide energy an easy path to ground.
- D. Never paint a ladder. Paint will conceal defects and can cover rating labels.
- E. Never reach far out from a ladder or turn excessively while on a ladder. These actions risk destabilizing ladder.
- F. Never store a ladder in the rain or direct sunlight. These shorten ladder service life.
- G. Never lean ladders on windows, unsecured surfaces or other unstable support. Your support point must be as stable as your base.
- H. Never use a defective ladder.

Inspection:

The safety of ladders must be assessed by the user prior to each use. Only ladders in good condition will be used. Periodic, comprehensive inspections are recommended to ensure each ladder is fit for use. Unsafe ladders must be clearly marked or tagged as unsafe (e.g. Dangerous Do Not Use). Supervisors will determine if repair or disposal is needed.

Training:

Each employee of Alta Construction that routinely uses ladders shall receive initial training on the provisions of this policy prior to working with ladders.

Training will include:

- A. A summary of the requirements in this policy and general equipment safety.
- B. Orientation to the ladders that are available to an individual for tasks required for their job.
- C. Physical hazards associated with ladder use in the workplace.
- D. Proper use and safety procedures to protect against accidents, including placement and orientation of ladders.
- E. Inspection and recordkeeping.
- F. Resources for answers to use, maintenance and safety questions.

Training will be performed by supervisors at the jobsite or at Alta Construction Shop.

Manual Lifting Policy

Alta Construction strives to make a safe environment for our employees to work in. This policy is intended to reduce the risk of manual handling injuries and provide guidance on the measures that should be taken to ensure safe lifting and carrying in the work place.

Definition:

The definition of manual handling is any activity requiring the use of force exerted by a person to lift, lower, push, pull, carry or otherwise move, hold or restrain any inanimate object.

Regulations require employers to avoid the need for hazardous manual handling activities so far as reasonable practicable. Where it is not possible to eliminate hazardous manual handling, an assessment must be undertaken to determine level of risk. Suitable controls must then be introduced to reduce the risk of injury to the lowest extent reasonably practicable. This may be achieved by the use of automation, mechanical aids, or redesigning the system of work or even the workplace itself.

Assessment of Risk:

An assessment of manual handling activities will be carried out by supervisors. Risks which are identified will be reduced to the lowest level reasonably practicable. The following factors should be considered during assessment.

The Task:

- 1. Bending and stooping to lift a load significantly increases the chance of a back injury.
- 2. Items should ideally be lifted from no lower than knee-height to no higher than shoulder height. Outside this range, lifting capacity is reduced and risk of injury is increased.
- 3. When items are required to be lifted from above shoulder height, a stand or suitable means of access should be used.
- 4. Items which are pushed or pulled should be as near waist level as possible. Pushing is preferred, particularly where the back can rest against a fixed object to give leverage.
- 5. Carrying distances should be minimized, especially if the task is regularly repeated.
- 6. Repetitive tasks should be avoided whenever possible.
- 7. Tasks which involves lifting and carrying should be designed in such a way as to allow for significant rest breaks (rotation of tasks) to avoid fatigue.
- 8. Avoid tasks which require twisting the body whenever possible.

The Load:

- 1. The load should be kept as near as possible to the body trunk to reduce strain and should not be of such a size to restrict vision.
- 2. An indication of the weight and center of gravity should be provided when available. Unstable loads should be handled with extreme caution.
- 3. Ensure there is secure hand holds.
- 4. Use personal protective equipment (gloves to protect against sharp edges or splinters).

The Individual:

- 1. Consider the employees age and physical fitness.
- 2. Consideration must be given to personal limitations, employees must not attempt to handle items heavier than their capabilities. Assistance must be sought when necessary.
- 3. Allowances for persons with physical and clinical reasons shall be made. Pregnant women should also not be required to undertake lifting or carrying tasks.
- 4. Knowledge and understanding of the work is an important factor in reducing risk of injury.
- 5. Individuals undertaking lifting or carrying will be given suitable instruction, training and information to undertake task with minimum risk.

The Working Environment:

- 1. There must be adequate space to enable the activity to be conducted in a safe manner.
- 2. The transportation route must be clear of obstruction.
- 3. Lighting, heating and weather conditions must be taken into consideration.
- 4. Floors and other working surfaces must be in a safe condition and adequate ventilation is required.
- 5. The use of personal protective equipment may be necessary for task. If personal protective equipment restricts safe and easy movement, report this to supervisor.
- 6. Interruptions from other employees should be avoided, as this can reduce the concentration of individuals doing the lift.

Duties of Supervisors:

- 1. Ensure risk assessments are completed before lifting is done.
- 2. Retain records.
- 3. Employees are properly supervised during lifts.
- 4. Adequate information and training on proper lifting techniques is provided to employees carrying out manual handling activities.
- 5. Any injuries or incidents related to manual handling are investigated, with remedial action taken and installed in procedures to avoid future injuries.
- 6. Ensure employees adhere to safe work practices.
- 7. Ensure employees undertaking manual handling tasks are suitably screened for reasons of health and safety, before undertaking work.
- 8. Make special arrangements, when necessary for individuals with health conditions that could be adversely affected by manual handling operations.

Duties of Employees:

- 1. Report to Management any personal conditions which may be detrimentally affected by manual handling activity. This information will be held in confidence.
- 2. Comply with instruction and training which is provided.
- 3. Their own health and safety is not put at risk.
- 4. Employees must use equipment provided to minimize risk.
- 5. Employees must report issues related to manual handling activities must report them to supervisor or management.

Information and Training:

Suitable information and training will be provided to persons required to carry out manual handling activities. Training needs will be identified and reviewed by supervisors. Refresher training will be conducted at reasonable intervals. Employees will be informed of the approximate weight of loads and objects which have eccentric weight distribution.

Safe System of Work:

Poor lifting and carrying techniques can result in discomfort and increase the risk of injury. In extreme circumstances these injuries can have permanent effects. These risks can be reduced by following these simple precautions.

- 1. Make proper use of aids to lifting such as trolleys, pallet jacks and other lifting equipment.
- 2. Store heavy items between shoulder and hip height. When possible only store small, light items above shoulder or below knee height.
- 3. Use legs and knees to bend and lift- Do not stoop or bend the back.
- 4. Avoid tasks that require stretching and twisting.
- 5. Ensure regular rest breaks are taken.
- 6. Ensure there are no sharp hot or cold edges which could cause injury.
- 7. Ensure walkways are free from obstruction.
- 8. Use proper personal protective equipment.
- 9. Report any problems or concerns associated with manual handling operations to supervisor or management as soon as possible.

Process Safety Management (PSM) Contractor Responsibilities

Purpose:

Process Safety Management is the proactive identification, evaluation and mitigation or prevention of chemical releases that could occur as a result of failures in process, procedures or equipment. The major purpose of process safety management of highly hazardous chemicals is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries.

Alta Construction is required to recognize and participate as a contract employer at client locations with PSM programs in place. Alta Construction, as a contractor, has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows:

- A. Alta Construction shall assure that each contract employee is trained in the work practices necessary to safely perform their duty.
- B. Alta Construction shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to their job and process and the applicable provision of the emergency action plan.
- C. Alta Construction shall document that each contract employee has received and understood the training required by this paragraph. Alta Construction shall prepare a record, which contains the name of the employee, the date of training, and the means used to verify that the employee understood the training (test).
- D. Alta Construction shall assure that each contract employee follows the safety rules of the facility including the safe work practices required with CFR 1910.119.
- E. Alta Construction shall advise the employer of any unique hazards presented by Alta Construction work, or of any hazards found by Alta Construction.
- F. Alta Construction will assure that trade secret information will be kept in confidence as process safety information is released to them.
- G. Alta Construction shall participate in all client PSM requirements, as directed including:
 - 1. Employee Participation
 - 2. Process Hazard Analysis (PHA)
 - 3. Training
 - 4. Pre-Startup Safety Review (PSSR)
 - 5. Hot Work Permits
 - 6. Incident Investigation
 - 7. Compliance Audits
 - 8. Process Safety Information (PSI)
 - 9. Operating Procedures
 - 10. Contractors
 - 11. Mechanical Integrity
 - 12. Management of Change
 - 13. Emergency Planning and Response
 - 14. Trade Secrets

Alta Construction, as a contract employer, shall follow safe work practices established by the employer. The client shall develop and implement safe work practices to provide for the control of hazards during operations such as Lockout/Tagout, confined space entry, opening of process equipment or piping, hot work and control over entrance into facility by maintenance, contractor, laboratory or other support personnel. These safe work practices shall apply to client employees and contractor employees. To comply with CFR 1919.19, Alta Construction is required to complete all required documentation for any permit-required activities.

Alta Construction shall not perform hot work until a hot work permit is obtained from the client. The permit shall document that provisions of CFR 1910.252(a) have been met.

Alta Construction employees must immediately report all accidents, injuries and near misses. An incident investigation must be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained for five (5) years.

Respiratory Protection Policy

Purpose:

There are some employees of Alta Construction that may be exposed to respiratory hazards during routine work-related operations. This policy is in place to insure the employees of Alta Construction are protected from these hazards. When engineering controls are not capable of reducing exposure or are not feasible, the use of personal respiratory protective equipment becomes necessary.

Scope:

This program applies to all employees of Alta Construction who may be required to wear respirators during normal work operations within the scope of their job descriptions. Employees participating in the respiratory protection program do so at no cost to them. The expense associated with training, medical evaluations and respiratory protetive equipment will be the responsibility of Alta Construction.

Responsibilities:

Safety Manager: The Safety Manager will serve as the program administrator and will be responsible for implementing this Respiratory Protection Policy.

Duties Will Include:

- A. Identifying work areas, processes or tasks that require workers to don respirators and evaluating hazards.
- B. Selection of respiratory protection.
- C. Monitor respirator use to ensure that respirators are used in accordance with their certification.
- D. Arrange for and conduct training.
- E. Ensuring proper storage and maintenance of equipment.
- F. Administering the medical surveillance program.
- G. Maintaining records of program.
- H. Evaluating program for compliance.

Employees:

Each employee named in program has the responsibility to wear their respirator when and where required and in a manner in which they were trained.

Employees must also:

- A. Care for and maintain respirators as instructed, and store them in an appropriate manner.
- B. Inform their Supervisor or Safety Manager if respirator no longer fits well, and request one that fits.
- C. Inform Safety Manager of any respiratory hazards that they feel are not adequately addressed in the performance of their work duties and any other concerns they have regarding the program.
- D. Inform the Safety Manager of any changes in their physical or health status that may impact their ability to wear a respirator.

Selection Procedure:

The Safety Manager will select respirators to be used by personnel. Only respirators, filters, cartridges and canisters certified by the National Institute for Occupational Safety and Health (NIOSH) will be chosen. The selection is based upon the physical and chemical properties of the air contaminant and the concentration level likely to be encountered. The Safety Manager will conduct a hazard evaluation for each operation where an airborne contaminant may be present during routine and emergency operations.

The Hazard Evaluation will include:

- 1. Identification and development of a list of hazardous substances that employees may encounter.
- 2. Review of work processes to determine where potential exposures to these hazardous substances may occur.
- 3. Exposure monitoring, if possible, to quantity potential hazardous exposures.

Medical Surveillance:

Employees who are either required to wear respirators, or who choose to voluntarily don respirator protection, must pass a medical exam before being permitted to wear a respirator. Employees are not permitted to wear respirators until a physician or qualified licensed health care provider has determined they are medically able to do so. An employee refusing the medical evaluation will not be allowed to work in an area or operation requiring respirator use. Medical Evaluation will be confidential and be performed during regular working hours.

- A. Follow-up Medical exams will be granted to employees as required by the standard, or if employees experiences medical difficulties when wearing the respirator.
- B. All Examinations and questionnaires are to remain confidential.

Fit Testing:

Before any employee may be required to use a respirator, the employee must be fit-tested with the same make, model and size of respirator that will be used. This applies to respirators, including air purifying and SCBA. Test will be quantitative and done before initial use and annually thereafter.

General Use:

- A. All employees will use their respirators under the conditions specified by this program, and in accordance with the training they received on the use of each particular model. In addition, the respirator shall not be used in a manner which is not certified by NIOSH or by its manufacturer.
- B. All employees will conduct a user seal check each time they use their respirator.
- C. Employees must clean their respirators and change filters, cartridges or canisters when required.
- D. Employees are not permitted to wear respirators if they have any condition, such as facial scars, facial hair, glasses or missing dentures that prevents respirators from achieving a good seal.
- E. For any malfunction of a respirator (e.g., such as breakthrough, facepiece leakage, or improperly working valve), the employee should inform the Safety Manager that the respirator is no longer in working order.

- F. All employees wearing a supplied air respirator will operate using the buddy system. Employees shall assist workers who experience a malfunction.
- G. Employers shall insure one employee is located outside the IDLH atmosphere, who maintains communication, has notification ability and procedure knowledge, and to provide necessary assistance.
- H. Employees must leave area to wash face and respirator facepiece and change cartridges or if they detect vapor, have a gas breakthrough or feel resistance while breathing.

Cleaning:

- 1. Respirators are to be regularly cleaned and disinfected.
- 2. Respirators will be cleaned after each use.
- 3. Wipe down facepiece with disinfectant wipes.
- 4. Let air-dry in clean area.
- 5. Place in clean, dry plastic case or other airtight container.
- 6. Safety Manager will ensure an adequate supply of cleaning and disinfectant material is available. If supplies are low employees should contact Safety Manager.

Inspection:

All respirators used in routine situations shall be inspected before use and during cleaning. Respirators maintained for use in emergency situations, shall be inspected at least monthly and shall be checked for proper function before and after each use. Emergency escape-only respirators shall be inspected before being carried into workplace for use. Inspections shall include a check of respirator function, tightness of connections and condition of various parts.

Maintenance:

- A. Respirators are to be properly maintained at all times in order to ensure that they function properly and adequately to protect employee.
- B. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced before use. No components will be replaced or repairs made beyond those recommended by the manufacturer. Respirators will be inspected after each use.

Storage:

- A. Respirators must be stored in a clean, dry area and in accordance with manufacturer recommendations.
- B. All respirators will be stored to protect them from damage, contamination, dust, sunlight, chemicals and extreme temperatures.
- C. Respirators shall be stored in such a way as to prevent damage and deformation of facepiece and exhalation valve.
- D. The Safety Manager shall store the supply of respirators and respirator components in their original manufacturer packaging if available.

Employee Training:

No employee will be permitted to work with a respirator until they have received training in Respiratory Protection. The training will be provided or coordinated by Safety Manager and will cover the following topics:

- 1. Explanation of the hazard and what would happen if respiratory protection was not used.
- 2. Elements of the Respiratory Protection Program and the employee's responsibility under it.
- 3. Selection of respiratory protection and who is authorized to modify selection.
- 4. Medical surveillance program and the Respirator Fit Test.
- 5. Function, capabilities, and limitations of the selected respiratory protection.
- 6. Explanation of the operation of the respiratory protection, including how to don, check fit and wear respirator properly.
- 7. Respirator maintenance including cleaning, inspection and storage.
- 8. Recognition and handling of emergency situations.
- 9. Employees will receive initial training before first use of respirators and annually thereafter.

Program Evaluation:

The Safety Manager will conduct periodic evaluations of the workplace and operating conditions to ensure the provisions of this program are implemented. The evaluation will include regular consultations with employees who use respirators, about fit selection, use, maintenance, and overall program effectiveness. Safety Manager shall also review the records of this program periodically.

Documentation and Recordkeeping:

For each employee that uses a respirator, the following records will be maintained.

- A. Medical records, including copies of the Respirator Fit Test and results of any physical examinations performed.
- B. Training records of employee.

Return to Work Policy

Purpose

Alta Construction strives to assist employees to Return-to-Work at the earliest possible date following an injury or illness. However this policy is not intended to supersede or modify the procedure applicable to employees eligible for reasonable accommodation or covered under the Americans with Disabilities Act (ADA) or leave benefits under the Family and Medical Leave Act (FLMA).

Eligibility

The policy applies to regular full-time employees who are on leave as a result of injury or illness and who are receiving worker's compensation benefits.

Transitional Work

Alta Construction defines "Transitional work "as temporary, modified work assignments within the workers physical abilities, knowledge and skills. Employees are notified of this program during orientation period and by reading Alta Constructions Employee Handbook.

When possible, transitional positions will be made available to injured workers to minimize or eliminate time lost from work. Alta Construction cannot guarantee a transitional position and is under no obligation to offer, create or encumber any specific position for purpose of offering placement to such a position.

Transitional assignments are designed to be temporary in nature and will be reviewed monthly to determine the appropriateness of continuance. The maximum time frame for light duty will be six (6) months.

In the event an employee refuses transitional work (outside the employee's FMLA benefit period) and the employee's attending physician has affirmed the employee's physical ability to perform the transitional position, Alta Construction is not obligated to provide an alternative position.

Procedures

To obtain a transitional position, the employee must obtain a return-to-work form from attending physician outlining work restrictions. Alta Construction will provide a letter to physician stating that we may have modified work if necessary.

If the attending physician releases the employee to return to work on modified duty and has completed the return to work form, the form must be returned to HR within 24 hours following the medical appointment. The employee cannot return to work without the release of the attending physician.

HR will review the Return-to-Work form and identify a transitional position for the employee that is appropriate and if it falls within business needs.

Transitional positions are developed based on the physical capability of the worker, the business needs, and the availability of transitional work. Alta Construction will determine appropriate work hours, shifts, duration and work locations of all work assignments. Alta Construction reserves the right to determine the availability of transitional work.

It is the responsibility of the employee to provide HR with a current address and phone number. The employee must notify HR within 24 hours of any changes in medical conditions.

It is the responsibility of the employee's supervisor to notify HR immediately of any work related injuries.

Employees must not exceed the limitations set forth in the Return-to-Work form. It is the employee's supervisor responsibility to ensure this does not happen.

All documentation related to an incident will be maintained by employer.

All medical records for injured employees will be kept confidential.

Scaffold Policy

Purpose:

The purpose of this policy is to ensure the safe use, erection, and dismantling of scaffolding by the employees of Alta Construction, while complying with all Local, State and Federal rules and guidelines.

Scope:

This policy will serve as the guidance document concerning the safe use, erection and dismantling of scaffolding for Alta personnel.

Definitions:

Competent person: one who has the training and experience to recognize unsafe scaffolding, the erection of such and the dismantling of scaffolding. The competent person has the responsibility and authority to halt any activities in and around the use of, erection of, or dismantling of scaffolding. They also have the authority to ensure measures are taken to correct any deficiency concerning scaffolding. The competent person can be an authorized employee, supervisor, contractor, engineer or contractor liaison.

Policy and Procedures

- A. All scaffolding shall be constructed and conform to OSHA 29CFR1926.451 and 1910.28.
- B. All scaffolding shall be erected, moved, dismantled or altered by trained personnel under the supervision and direction of a competent person. The training that personnel receive shall meet the standards for OSHA 29CFR 1926.454.

Training Topics include but not limited to:

- 1. Nature of scaffold hazards.
- 2. Correct procedures for erecting, dismantling, moving, repairing, inspecting, and maintenance of scaffold.
- 3. Design criteria. The intended load carrying capacity and intended use of scaffold.
- 4. Employees shall be prohibited from working on scaffolds covered with snow, ice or other slippery materials, except as necessary to remove such material. Work on or from scaffolds id prohibited during storms and high winds unless competent person has determined it safe for employees to be on scaffold and those employees are protected by personal fall arrest systems or wind screens.

Re-Training:

- 1. When employer has reason to believe that an employee lacks the skill or understanding needed for safe work involving erecting, dismantling or use of scaffold.
- 2. When changes at worksite present a hazard employee was not previously trained.
- 3. When changes in types of scaffold, Fall Protection, Falling Object protection or other equipment present a hazard that employee was not previously trained.

- 4. Where inadequacies in an affected employee's work involving scaffolds indicate employee has not retained proficiency.
- C. A competent person shall inspect scaffolds in use daily before each work shift for damage, modifications or any visible defects, etc. A written record of such shall be kept readily available. (Preferably on a scaffolding tag designed for such).
- D. Scaffolds shall also be re-inspected after any occurrence which could affect the scaffold's structural integrity. A competent person shall perform this inspection. A written record of the inspection shall be kept and made readily available.
- E. Scaffolding tagging system.

NOTE: Scaffold tags shall be affixed to each scaffold in a visible location that is easily accessible.

- 1. Green Tag: Indicates the scaffold has been erected to meet federal / state OSHA standards and is safe for all craft work.
- 2. Yellow Tag: Indicates the scaffold DOES NOT meet federal / state OSHA specifications. All employees working from this scaffold must wear and use an approved safety harness.
- 3. Red Tag: Indicates the scaffold is being erected, taken down, or has been found defective. DO NOT WORK ON RED TAGGED SCAFFOLDS.
- F. It is the responsibility of every user to review the tags and scaffold. Users of the scaffold will use the scaffold only when the competent person deems the scaffold safe. If the employees feel the scaffold is not safe, it is their responsibility to contact their supervisor and not work off scaffold until a determination is made as to the safety of the scaffold.
- G. Scaffolds shall not be moved while in use, occupied or hoisting material.
- H. Tag lines shall be used to guide materials be hoisted onto scaffolds.
- I. Scaffolds shall not be overloaded.
- J. All scaffolding must be constructed to applicable standards.
- K. Only use OSHA approved boards. Do not use scaffolding boards for any other use. Boards should be stored properly when not in use. Parts, materials and tools shall not be left on scaffolding. Scaffolding shall be kept clear of inappropriate materials.
- L. An access ladder, or the equivalent, shall be provided for all scaffolds. Climbing the sides of scaffolds is prohibited.

Responsibilities

- A. Supervisor: It is the responsibility of the supervisor to inspect their area and ensure a competent person is assigned to oversee the erection, use and dismantling of scaffolding.
- B. Competent Person: Is responsible for the safe erection, use, and dismantling of scaffolding, including regularly inspecting scaffolding they are assigned, and taking corrective measures when necessary. All inspections and corrective measure taken will be documented by the competent person.

Mentoring/Short Service Employee

Policy Statement

Alta Construction is committed to providing a safe and healthy work environment for all employees. In the pursuit of this goal, the following "Short Service Employee (SSE)" policy is established for the following.

- To prevent work related injuries and illnesses to new hires.
- To ensure supervisors and co-workers can readily identify SSE participants.
- To ensure all SSE participants are closely monitored and mentored by experienced employees.
- Subcontractors must adhere to SSE requirements.
- Clients of Alta Construction will be notified that SSE will be working at jobsite.

Definitions

Short Service Employee (SSE)- An employee with less than six (6) months experience with Alta Construction.

Mentor- An experienced employee who has been assigned to help and monitor an SSE for compliance with policies and procedures by their supervisor.

Mentoring Provisions

Mentors will set the proper safety example to any SSE assigned to them. A mentor may only be assigned two SSE per crew. Mentors must be onsite and able to monitor SSE.

SSE Identification

SSE participants will be required to wear Green hard hats. Alta will comply with all client SSE identifications. SSE may not work alone.

Program Administration

The Safety Manager is responsible for the implementation of policy. Safety Manager will maintain, review, and update policy when necessary to include new or modified procedures.

Environmental Policy

- A. It is the policy of Alta Construction, Inc. and its subsidiaries to conduct business in a socially responsible and ethical manner that seeks to protect the environment. Our goal is to be a leader in environmental practices by emphasizing and encouraging innovative and creative solutions, and continually improving our environmental performance.
- B. Integrate environmental protection into every aspect of its business.
- C. Comply with all environmental regulations without regard to the degree of enforcement.
- D. Participate in the development of environmental legislation, regulation or policy issues that may significantly impact our business.
- E. Work pro-actively with appropriate government agencies to ensure timely, reasonable and cost effective solutions for issues.
- F. Follow relevant standards, good engineering practices and risk management principles to ensure Alta Construction, Inc. environmental protection activities are conducted responsibly.
- G. Ensure adequate resources are available to comply with this policy.
- H. Conserve company and natural resources by careful management of emissions and discharges, and by minimizing waste generation.
- Ensure conformity with this policy and continual improvement through a comprehensive compliance program, including audits and the development and review of performance indicators.
- J. Require that all employees are held responsible for compliance with all policies, procedures, practices and laws applicable to their duties.

Subcontractors

Alta Construction, Inc. is committed to working with subconstructors and service providers who, at a minimum, uphold the relevant environmental laws, regulations and policies of the areas in which they do business.

Alta Construction

Alcohol, Drug, and Contraband Policy

Effective Date: 10/01/2018

Approved By: Wally Hale Safety Manager

For the purpose of this policy "Company" shall refer to: Alta Construction

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1) PURPOSE

To ensure a safe, healthy, and productive work environment for the employees of the company, customers, and others on company or customer property. To protect company and customer property and assets, ensure efficient operations, and meet any specific requirements of customers. Company shall enforce this drug, alcohol, and contraband policy in a fashion consistent with the laws of the state in which the company employees' are employed.

2) DEFINITIONS

a) Company Personnel:

All company employees, agents, subcontractors or subcontractors' employees performing field operations work on company or customer property, or those being considered for employment by the company. This includes temporary and part-time personnel.

b) Property or Customers Property:

All real or tangible personal property, including facilities, buildings, vehicles, products and equipment, either owned or controlled by the company or its customers.

c) Prohibited Substances:

- i) Illicit or un-prescribed drugs, controlled substances and mood or mind-altering substances including all forms of naturally occurring and synthetic drugs (for example: any synthetic derivative/product that produces a marijuana-type high and any herbal products not intended for human consumption);
- ii) Potentially impairing medications (e.g. may be prescription drug or over-the-counter medication or herbal medicine):
 - (1) Used without a prescription, or
 - (2) Used in a manner inconsistent with the prescription or directions for usage, or
 - (3) Used without disclosure to company as provided by Section 3(b)(iii) of this Policy
 - iii) Alcohol;
- iv) Medical Marijuana/Recreational Marijuana The use of marijuana for medical or recreational purposes, even if permitted by state law, regulation or ordinance, will not be considered an acceptable explanation for a confirmed positive laboratory report for marijuana and will be reported by the Medical Review Officer (MRO) as a verified positive drug test for marijuana. The company will treat marijuana like they would alcohol; they are not required to tolerate individuals being under the influence while at work, or on customer property. The company will not permit or accommodate the use, consumption, possession, transfer, display, transportation, sale or growing or marijuana in the workplace.

d) Reasonable Suspicion:

A belief based on objective and articulable facts sufficient to lead a supervisor to suspect use of prohibited substances.

For the purposes of this section a *supervisor* is a company employee acting in an official supervisory capacity who has successfully completed drug nd alcohol supervisor training as outlined in this policy.

e) Under the Influence:

- i) The presence of a prohibited substance or metabolites of a prohibited substance in body fluids above the cut-off level established by company's policy or other commonly accepted cut-off level;
- ii) The presence of a prohibited substance that affects and individual in any detectable manner. The symptoms of influence may be, but are not limited to, slurred speech or difficulty in maintaining balance.

f) Contraband:

- i) Any drug or alcohol related paraphernalia used or designed for use in testing, packaging, storing, injecting, ingesting, inhaling or otherwise introducing into the human body any Prohibited Substance, or
- ii) Any paraphernalia or substance used or designed for use to dilute, substitute, or adulterate any alcohol or drug test specimen, or to otherwise obstruct the alcohol or drug testing process or
 - iii) Firearms, ammunition, explosives, and weapons.

g) Designated Employee Representative (DER):

Company personnel with oversight of the company Drug and Alcohol program and authorized by the company to receive test results and make required decisions regarding test results.

h) Stand Down:

The immediate removal of company personnel from performing services for company and /or customers.

i) Medical Review Officer (MRO):

A licensed or certified physician, designated by the company, responsible for the review and verification of the integrity of drug testing results and for the final interpretation and reporting of drug test results.

k) Prescription Drug:

A regulated pharmaceutical medicine that requires physician or other qualified healthcare professional authorization before it can be obtained in the jurisdiction where company personnel are performing services for company or customers. The term is used to distinguish it from over-the-counter drugs, which can be obtained without authorization.

1) Safety Sensitive Positions:

Any position with job responsibilities such that a lapse by an individual in that position could increase the probability or serious injury, significant environmental or community impacts or significant damage to company or customer assets.

3) PROHIBITIONS

Unless specifically authorized in writing by the company and its customers, Alta Construction policy shall prohibit company personnel from the following:

- a) Using, possessing, selling, manufacturing, distributing, concealing or transporting on company or customer property (including off-duty time) any of the following items:
 - i) Any prohibited substance; or
 - ii) Contraband (except where in violation of state law); or
 - iii) Being under the influence of any Prohibited Substance.
- b) Possessing or using prescription drugs or over-the-counter medication that may cause impairment, except when <u>all</u> of the following conditions have been met, while on company property (unless otherwise provided for under the American's with Disabilities Act):
- i) Prescription drugs have been prescribed by a licensed physician or the person in possession of the drugs, and;
- ii) The prescription is not expired and was filled by a licensed pharmacist for the person possessing the drugs, and;
- iii) The individual notifies their supervisor that they will be in possession of, or using, impairment-causing prescription drugs or over-the-counter medication and appropriate steps are taken to accommodate the possibility of impairment, including but not limited to, removal from work for the

period of possible impairment. Note: Discussions between the individual and their supervisor must be limited to the individual's ability to perform essential job functions.

- iv) Company's health professional has assessed the capability or fitness of personnel to perform safety sensitive duties.
- c) Being under the influence of prohibited substances while performing any services for the company of their customers.
 - d) Switching, diluting or adulterating and urine, blood or other sample used for testing.
 - e) Refusing to submit to a test for alcohol or drugs.
 - f) Refusing to submit to an inspection as provided for in Section 5 of this policy.
 - g) Being the subject of a confirmed positive alcohol or drug test.

4) ROLES AND RESPONSIBILITIES

a) Designated Employee Representative (DER):

Designated Employee Representative (DER) should be an employee within the Health, Safety, Security and Environment (HSSE) department who is authorized to receive test results and other communications, take immediate action to remove workers from a company or customer's jobsite and make required decisions in the testing and evaluation process. Specific roles and responsibilities assigned to a DER should include, at a minimum, the following:

- i) Select and contract with a laboratory or service provider, based on pre- determined criteria, to help implement all or part of the Drug, Alcohol and Contraband Program.
- ii) Receive general correspondence, newsletter, and announcements from laboratories and service providers.
- iii) Coordinate reasonable suspicion training for all supervisors and ensure they have signed a document acknowledging completion of the training.
 - iv) Schedule and coordinate drug and alcohol testing activities.
 - v) Maintain confidential files for the Drug, Alcohol and Contraband Program.
- vi) Monitor non-negative, positive, or invalid test results and results supporting that the specimens have been adulterated or substitute to determine appropriate actions.

b) Medical Review Officer (MRO):

An MRO is responsible for receiving and reviewing laboratory test results and evaluating medical explanations for certain drug test results. Roles and responsibilities assigned to an MRO typically include the following:

- i) Serve as an independent party to oversee the accuracy and integrity of the company Drug and Alcohol Testing process (DOT and NON-DOT).
 - ii) Review appropriate copies of chain-of-custody forms to determine if problems exist.
- iii) Conduct verification interviews with workers for non-negative drug test results or results indicating that the specimen has been adulterated or substituted.
- iv) Interpret drug test results to determine if a legitimate medical explanation exists for a laboratory's confirmed positive, an invalid test result or adulterated or substituted specimen.
- v) Immediately report verified positive or invalid results, results requiring immediate collection under direst observation, adulterated or substituted specimens, and other refusals to test to appropriate personnel.
- vi) Report written drug test results in a confidential manner to appropriate personnel authorized to receive such information.

5) SERCHES AND INSPECTIONS

Searches and inspections may be:

- a) Conducted on company or customer property, at any time, by company or customer supervisors or authorized search and inspection specialists including scent trained animals.
- b) Unannounced searches or inspections of company or customer personnel and their property, which may include, but not limited to: wallets, purses, lockers, baggage, offices, desks, toolboxes, clothing, and vehicles.
- c) Employees have the right to refuse being searched or having their personal effects searched or to cooperate in the requested tests; however, refusal to allow such searched or to cooperate in such lawfully permitted searches by an employee will be cause for disciplinary action, up to and including immediate termination.
- d) If discovery of Prohibited Substances or Contraband cannot be directly associated with individual company personnel, but can be reasonably associated with a defined group of company personnel (e.g. people who use one change room):
- a. Customers may conduct or require company to conduct an inspection of company personnel group's clothing, wallets, purses, baggage, lockers, work areas, desks, tool boxes, vehicles and other designations by customers, and/or
- b. Customers may require company to conduct Group suspicion-based testing of company personnel within this group.

6) TESTING REQUIREMENTS

Drug and alcohol testing must meet the requirements of customers:

a) Pre-Access Testing

- i) All company personnel are subject to customer pre-access testing which may mandate that the employee(s) receive a negative result on a drug and/or alcohol test within a customer's specific required amount of time preceding the employee's first access to customer property. Note: Some customers may waive this requirement if employee(s) are currently active in a random testing pool. Annual drug and alcohol testing are also required by specific customers. Upon customer's request, company shall so certify in writing.
- ii) Company will provide no information to customers identifying individuals who have positive pre-access tests.

b) Post-Incident Testing

Retaliation against employees who report accidents in strictly forbidden. Any drug and alcohol testing under with section will be applied in a neutral fashion, to foster a safe work environment, and only to identify drug/alcohol use in the recent past. Testing under this section will not be undertaken to retaliate against employees for reporting workplace injuries.

Immediately following an incident or as soon as possible; company should communicate with the customer and receive confirmation that post-incident drug and/or alcohol testing will be required.

- i) Company shall remove individuals from customer property and surrender their site credentials to the customers IF; it is determined by the company or customers, from the best information available immediately following a work-related incident, that the performance of one or more company personnel contributed to the incident or cannot be completely discounted as a contributing factor to the incident.
- ii) Alcohol and drug testing must be completed as soon as possible after the decision to test. If specimen collection is not completed as soon as possible after the decision to test. If specimen collection is not completed within 2 hours, the reason for delay must be documented. Customers may request to

review reasons for the delay and decide if they are acceptable. An individual so removed will be allowed to return to work on customer property *only after*:

- (1) Company conducts alcohol and drug testing on the individual as soon as possible following the individual's removal from the site, and
 - (2) the company certifies all of the following in writing:
 - (a) the test identification number
 - (b) the individual's 4 digit identifying number
 - (c) the test date and time, and
 - (d) a negative test result
- (3) On the written certification the company will include a consent signed by the individual permitting disclosure to customers of the test result.
- iii) If an employee who is subject to post-incident testing is conscious, able to urinate normally (in the opinion of a medical professional) and refuses to be tested, that employee shall be removed from their position and shall be subject to discipline.

For the purpose of this part "incident" means:

- (1) An actual event that caused:
 - (a) Injury requiring medical treatment beyond first aid
 - (b) Environmental impact beyond a small immediate area to:
 - (i) soil/ground-water
 - (ii) marine life, or
 - (iii) impact to nearby habitat, wildlife, livestock, crops, or fisheries
- (c) Process Safety events as determined by the responsible company or customer supervisor
- (d) Property damage as determined by the responsible company or customer supervisor
- (e) Motor vehicle accident (the operator of the vehicle or other individuals where there is evidence to support that they may have contributed to the incident)

****NOTE: Customers may define more stringent criteria

Or

- (f) An event that had potential for
 - (i) Serious injury/ fatality
 - (ii) Environmental impact beyond company or customer premises
- (iii) Property damage as determined by the responsible company or customer supervisor
- (2) The company may decide not to conduct a post-incident drug and/or alcohol test if:
- (a) the best information immediately available after the incident indicates that the employee's performance could not have contributed to the incident, or
- (b) Because of the time between the performance and the incident, it is not likely that a drug and/or alcohol test would reveal whether performance was affected by drug and/or alcohol use.

c) Reasonable Suspicion Testing

i) Upon reasonable suspicion of company or customers that company personnel is under the influence of a prohibited substance while on company or customer property (refer to Attachment 3 as a guide to assess whether there is reasonable suspicion for requesting a test), company shall remove the individual(s) from customer property and surrender their site credentials to the customers. Company should conduct alcohol and drug testing on the individual as soon as possible following the individual's removal from the site. If specimen collection is not completed within 2 hours, the reason for delay must be documented. Customers may request to review reasons for delay and decide if they are acceptable.

- ii) An individua removed from company or customer property for Reasonable Suspicion will be allowed to return to work on customer property only after:
 - (1) Company certifies all of the following in writing:
 - (a) the test identification number
 - (b) the individual's 4 digit identifying number
 - (c) the test date and time, and
 - (d) a negative test result
- (2) On that written certification the company will include an consent signed by the individual permitting disclosure to customers of the test result.

d) Group Suspicion-based Testing

- i) Group suspicion-based testing of company personnel may be required without notice on customer premises, based on evidence of Prohibited Substances or Contraband on customer premises that cannot be identified to a specific individual. Group Suspicion-based testing will be limited to the likely affected work group or work area.
 - ii) Company will immediately stand down the company personnel.
- iii) Alcohol and drug testing specimen collection must be completed within 2 hours, the reason for delay must be documented. Customers may request to review reasons for delay and decide if they are acceptable.

e) Random Testing

If specific customers require random drug and/or alcohol testing then the following guidelines will be followed:

- i) Unless otherwise specified by a specific customer, company personnel shall be subjected to:
 - (1) Un-announced random testing.
 - (2) Performed on a quarterly basis (at a minimum). Random tests must not be predictable.
 - (3) That yields a compliance of an annualized rate as determined by the customer

operator.

- ii) If required by the specific customer, a breath alcohol test will be given at the same time as the drug test.
- iii) Upon notification of being selected for a drug and/or alcohol test, company personnel must report to the collection site within 30 minutes, plus travel time. The reason for delay must be documented if unable to arrive within this time frame.
- iv) failure to report to the collection site, refusal to test, or adulterating a specimen is considered the same as a positive test and the individual could be denied access to company or customer premises.
- v) If company personnel are not in the random selection is made, they must complete another pre-enrollment test before being re-admitted to the random pool.

f) Wall-to-Wall Testing/Group Random Testing

Company personnel may be subject to:

- i) Un-announced en masse drug and alcohol testing.
- ii) Such tests are scheduled at the sole discretion of the customers. This includes the determination of the scope and the timing of such testing.
- iii) Such a group may include all members of the named group on site at the determined time or time period and *shall not* be determined in terms of named individuals.
- iv) Such groups may include, but are not limited to, al company personnel on site, or by shift, by crew, by location, by craft, by company or by another similar category, including a random selection based on site access records.

g) Fitness for Work

After a fitness for work concern is identified, and before the company can return the individual back to perform safety sensitive serviced for customers, the company's health professional must evaluate the individual, clear them to return to work, define restrictions if applicable, and document the conclusion. A fitness for concern may be identified from such events as:

- i) MRO review of a laboratory positive test result may lead to an MRO negative determination, but the MRO may identify a fitness for work concern.
 - ii) A required medication disclosure by those in safety sensitive positions.

7) TESTING PROTOCOL:

Drug and alcohol collections, chain of custody and other related procedures shall be consistent with US DOT or industry practice. For testing purposes, substances and threshold levels will comply, at a minimum, with customer requirements.

a) Custody and Control Form (CCF)

A CCF is required for every drug test. Alcohol screening test results must be documented on either a CCF or an alcohol testing form. A CCF is required for every blood alcohol confirmation test. For confirmation alcohol tests using a breath alcohol device, result and zero blank printouts must be attached to the CCF or attached to the alcohol testing form.

b) Laboratory:

Laboratories selected for employee drug testing must be evaluated against the following criteria to help ensure that results obtained from these laboratories will be reliable.

- i) Laboratories must be certified according to local laws and regulations or industry practices for providing accurate and reliable services.
 - (1) Urine samples: A laboratory must be accredited/certified by either:
- (a) Department of Health and Human Services under the National Laboratory Certification Program or Substance Abuse and Mental Health Services Administration (SAMHSA), or
 - (b) College of American Pathologists Forensic Drug Testing (CAP-FDT), or
 - (c) National Laboratory Certification Program (NLCP).
- (2) Hair specimens must be analyzed by a Clinical Laboratory Improvement Program (CLIP) Accredited laboratory. Note: some customers will not allow hair testing as a means to meet their requirements.
 - ii) Special handling and chain-of-custody procedures must:
 - (1) be written and available, and
 - (2) discuss inspecting, documenting, storing, and transporting specimens.
- iii) Laboratory management and staff must have appropriate education, experience, and qualifications.
 - iv) Quality-Control procedures must be:
 - (1) written and available, and
 - (2) Include testing blank and spiked samples for verification.
- v) Laboratories must be able to provide technical assistance and advice concerning drug and alcohol testing.
- vi) Sample supplies appropriate to the type of specimen being collected or the test run must be readily available from the laboratory.
 - vii) Laboratories must be able to generate confidential and accurate reports.

c) Collection Personnel:

- i) <u>Urine</u> specimens must be collected by personnel who have been trained and certified according to the SAMHSA/DHHS guidelines which includes:
 - (1) basic information,
 - (2) qualification training,
 - (3) initial proficiency demonstration,
 - (4) refresher training, and
 - (5) error correction training.
- ii) <u>Hair</u> specimens must be collected by personnel that have documentation supporting that they have been trained in:
 - (1) Equipment and procedures used in gathering and collecting hair specimens,
 - (2) Preparing chain-of-custody forms,
 - (3) Preparing the specimen for shipment, and
- (4) Shipping the sample to an approved laboratory. Note: Hair testing will only be utilized for customer compliance when the customer has authorized this testing method.
- iii) <u>Breath/ Saliva</u> testing shall be conducted utilizing devices approved by the National Highway Traffic Safety Administration or equivalent. All collection and testing procedures shall mirror as closely as possible to US DOT (Department of Transportation) protocols.
- iv) A positive saliva test will be confirmed with a blood test. Personnel that have a blood alcohol concentration (BAC) level greater that 0.00 during work hours or while driving company or customer vehicles have violated the Drug, Alcohol and Contraband Program and are subject to disciplinary action up to and including termination.

8) NON-COMPLIANCE

Company personnel will be found to be in non-compliance if they:

- a) Violate any portion of this policy or the customer's policy, or
- b) Refuse to cooperate with the searches and tests included in this policy or the customer's policy.

9) COMPANY PERSONNEL DISQUALIFIED FROM PERFORMING SERVICES FOR CUSTOMERS

With respect to company personnel that are disqualified from performing services for customers:

- a) Company shall immediately remove the individual from customer property.
- b) Company shall immediately notify the customer that the individual is disqualified from performing services.
- c) Company will not assign or reassign the disqualified individual to perform services for the customer or in any other facility of the customer in the future.
- d) At customer's request, company shall, at its sole cost and risk, inspect all work in which the individual may have participated and submit a written report to the customer that documents the inspection and any findings, and the actions taken to assure all deficiencies have been corrected.

Note: Company shall comply with all applicable state and local related laws. If restrictions are places on employers, who have individuals that violate this policy, company shall contact their customer representatives for instructions pertaining to the specific individual.

10) SUBSTANCE ABUSE AWARENESS

Company warrants that company personnel performing work have each been fully informed of the requirements of this policy and customer's policy. Before beginning work on company or customer property, all company personnel must sign a written certification that they have been so informed and agree to be bound by the requirements. See Attachment 1-3.

11) APPLICABLE LAWS

Company shall comply with all applicable federal, state, and local drug and alcohol related laws and regulations applicable to company personnel (e.g., DOT regulations, Department of Defense (DOD) Drug-Free Workplace Policy, Drug-Free Workplace Act of 1988, etc.).

12) SUPERVISOR TRAINING

Company shall provide training/education to company supervisors. The list, at minimum, should consist of:

- a) Recognition of performance indicator of probable drug and/or alcohol use.
- b) Effects and consequences of drug and/or alcohol use to personnel health, safety and the workplace.
- c) 60-minute training session on the specific, contemporaneous, physical, behavioral, and performance indicators of probable **drug** use.
- d) 60-minute training session on the specific, contemporaneous, physical, behavioral, and performance indictors of probable **alcohol** use.
 - e) Random testing notification process.
 - f) Post-incident testing process.
 - g) Stand-down process
- h) Disqualified individual process, which includes flagging those individuals to ensure they won't be sent back to work for a customer.
- ** Records of trained individuals (including name and date) must be maintained by the company and available to customers upon request.

13) AUDIT

- a) Company shall keep records required by this policy available for inspection by customers during the period that the company is performing work for customers and for a period of (3) years after company ceases to perform work for that customer.
 - i) Such records include but are not limited to:
 - (1) Laboratory copies of test results.
 - (2) Chain-of-custody forms.
 - (3) Copies of signed acknowledgement/consent form from this policy.
 - (4) Random testing notification
 - (5) Post incident testing.
 - (6) Reasonable suspicion testing.
 - (7) Stand-down procedures
 - (8) TPA contact information (if used).
 - (9) MRO(s) names and contact information.
 - (10) List of collection sites.
- (11) Records of personnel training and demonstrated competency in drug specimen collection and evidential breathalyzer tester.
 - (12) Laboratory contact information.
- (13) Written procedure for ensure company personnel, who are disqualified from providing services to customers, continue to be excluded from customers locations.
 - ii) Records can be stored electronically as long as they are accessible upon request.
- b) At their discretion, customers may perform unannounced audits of the company's alcohol and drug program to verify that the company's policy and its enforcement comply with these guidelines.
 - c) At customer's request the company shall:

- i) Provide separate lists of company personnel (including name and 4 digit identifying number) who were eligible for customers work on a date specified by customers.
- ii) Provide customers with the following information on each alcohol and drug test conducted for each company personnel identified by customers from those lists:
 - (1) Date and type of test (e.g. random, pre-access) and;
 - (2) Laboratory chain-of-custody identification number and/or test number.
- d) Upon submission by customers of a list, or lists, or 4 digit identifying number, chain-of-custody ID numbers and test dates, the company shall obtain an agreement with any consortium, laboratory, or Medical Review Officer (MRO) providing drug and/or alcohol testing services for the company to ensure:
 - i) The consortium/laboratory will verify that the tests were conducted as represented, and
- ii) The consortium/laboratory or company MRO will provide a sworn statement attesting whether or not each of the tests identified by the customer can be conformed as negative.

ATTACHMENT 1

Acknowledgement of drug and alcohol contraband policy receipt

I hereby acknowledge that I have been provided a copy of the Alta Construction drug/alcohol policy requirements. I understand that disciplinary action up to and including termination, will result if I violate this policy.

I also hereby authorize and consent to disclosure by Alta Construction and its agents, including, but not limited to, any collecting and testing agencies, of the drug and alcohol test results and any related information to customers of Alta Construction and its authorized agents, assigns, or representatives.

Employee Signature

Date

*** This consent form is for release of NON-DOT tests. Please follow DOT regulations if you choose to submit

DOT test results in place of <u>non-dot</u> in order to meet the requirements of a specific client***

ATTACHMENT 2

1. SUPERVISOR TRAINING

Managers and supervisors must be adequately trained in the topics listed below to ensure they effectively communicate and implement the Drug, Alcohol, and Contraband Program.

- a) Rationale for having the Drug, Alcohol, and Contraband Program.
- b) Requirements contained in the program.
- c) Procedures for implementing the program.
- d) Drug and alcohol abuse terms and symptoms.
- e) Reasonable suspicion that an employee is under the influence of drugs or alcohol.
- f) Documentation of potential drug or alcohol abuse problems.
- g) Protecting employee confidentiality.

Training on the recognition of performance indicators of probable drug and/or alcohol use and on its effects and consequences to personal health, safety and the workplace shall be included. It is required that each supervisor who will determine whether an employee must be tested based on specific, contemporaneous, physical, behavioral, and performance indicators of probable drug and alcohol use. Records of individuals trained (including name and date) must b maintained by the company and available to customers upon request.

2. EMPLOYEE EDUCATION

Employee education opportunities must be developed to communicate the Drug, Alcohol, and Contraband Testing Program. Education and communication must include, but are not limited to the following topics:

- a) Requirements containing the Drug, Alcohol, and Contraband Program.
- b) Types and effects of drugs, including prescription and over-the-counter medication, and alcohol on employees and the ability to perform their work safely.
- c) Ways to assess whether employees may have drug and alcohol dependency problems or may be under the influence of drugs or alcohol.
- d) Requirements to inform supervisors of reasonable suspicion of an employee being under the influence of drugs or alcohol.
- e) Disciplinary actions for employees failing to comply with the Drug, Alcohol, and Contraband Program.