M&M ERECTORS

15400 VANTAGE PARKWAY WEST
HOUSTON, TEXAS 77032

Safety, Health & Hazardous Communication Program

JOB NAME

ADDRESS

This safety program was developed by:

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COMMITMENT TO SAFETY

The safety and health of every employee, sub-contractor, partner, customer, visitor and member of the public is a vital aspect of our operations. Our company is committed to strive for excellent performance in safety, health and environmental matters, with an emphasis on the prevention of accidents and injuries.

Our founding principles for safety are based on:

- All injuries and occupational illnesses can be prevented.
- Every member of the supervision and management team is responsible for administering the accident prevention program and will be evaluated accordingly.
- Each employee is responsible for following safe work practices and will be held accountable for his/her acts.
- Accidents and incidents with injury, property or environmental damage potential must be investigated.
- Training is a vital element for a safe and healthy work environment.
- The prevention of accidents, injuries and occupational illnesses is good business.

The Company is proud of our safety program and expects everyone from the newest employee to its most senior tenured executives to adhere to all the policies and procedures when it comes to safety.

The information contained herein provides guidelines for all our Operational Business Units. This manual should be kept readily accessible for reference for all work assignments.

The safety manual will be constantly reviewed for the most effective and up to date guidance on safety matters. As regulatory changes or company policies are revised, so will the manual. It will be a living document

It should also be made known that if any employee within the company ever discovers or feels a job task is considered to be unsafe they have the right to and are encouraged to shut down the job and report it to his or her immediate supervisor for resolution. We welcome suggestions from employees that will further help provide safe and healthful conditions and practices.

_____

Jim Robinson
Vice President Operations

SAFETY RESPONSIBILITIES

I. Management

A. Provide means to accomplish a sound safety policy.

B. Enforce this policy and discharge any employee willfully disregarding it.

C. Conduct periodic safety meetings and inspections and maintain records.

D. Investigate or cause to have investigated any and all accidents and file such reports on each.

E. Establish procedure for first aid and treatment of injuries

F. Provide each project with federal, state, and local safety code requirements.

G. Assign a member of the management staff the responsibility to carry out the Company Safety Program and to work with Project manager, estimators, superintendents, foreman and employees to resolve safety issues.

II. Project Managers, Estimators, and Project Engineers

A. With regard to safety, be responsible for including the proper amount of material, equipment and labor in the estimate to properly protect personnel and property.

1. Scope of proposed operations to included safety issues.
2. Exposure to people – present and future.
3. Project controls.
4. Housekeeping practices.
5. Personal protection.
6. Public relations.
7. Adjacent work in progress.

B. *On each visit to the job site, make safety inspections of the job conditions. Discuss unsafe practices or situations noted with the Project Superintendent.*

C. *Check the job site safety records on a regular basis, noting any trends in types of accidents*.

D. Make sure at project meetings that all Subcontractors' supervisory personnel are aware of the requirements of the Company Safety Program and that they understand that it is a part of their contract.

III. Superintendents

A. Be completely responsible for on-site safety and record keeping.

B. Make available all necessary personal protective equipment, job safety material, and first aid equipment.

C. Instruct the field personnel that safe practices are to be followed and safe conditions maintained throughout the jobs.

D. Instruct the foremen that they are not to require or permit their personnel to take unnecessary chances, but rather that they instruct them in proper and safe procedures.

E. Instruct Line Foreman with regard to their safety responsibilities, in such areas as giving individual safety instructions, construction toolbox safety meetings, accident investigations and following up on all safety recommendations.

F. Review all accidents with field personnel: File reports, and see that corrective action is taken immediately.

G. Establish first aid, fire, sanitation, and water facilities.

H. Be responsible for job planning, layout, and inspection of all operations.

I. Have available copies of all federal, and other applicable regulations, posted safety rules, OSHA forms, safety posters as required.

J. Be familiar with the laws pertaining to safety and their basic requirements.

K. Consult with management on extra hazardous activities.

L. If the job does not have any Foremen, Superintendent will do those responsibilities assigned to Foreman.

IV. Foremen

A. See that the <u>entire safety program</u> is carried out at the work level.

B. See that the employees commit no unsafe practices.

C. Make sure no unsafe conditions exist in work areas.

D. Make sure that necessary protective equipment is on hand and used.

E. Instruct all employees in safety procedures and job safety requirements – follow up and insist on compliance.

F. Conduct craft toolbox safety meetings, and discuss safety in personal conduct with employees.

G. See that all injuries are cared for properly and reported promptly.

H. Investigate all accidents; file complete reports, and correct the cause immediately.

I. Be familiar with the laws pertaining to safety and their basic requirements.

V. Employees

A. Abide by Company safety rules and regulations on the job.

B. Decide to observe others around you for dangerous working habits or conditions.

C. Report unsafe acts to your foreman. (You do not need to name the person involved.)

D. Make good safety practices a habit.

E. Attend all Toolbox Safety Meetings.

F. Never hide unsafe conditions.

G. Immediately report any accident, injury or “near miss” to your Foreman or Superintendent.

Subcontractors’ Responsibility

Subcontractors shall be familiar with and abide by the safety rules and regulations of **M&M ERECTORS**
of any governmental body having the authority to control the manner or method of carrying out the work, including, but without limitation the Williams-Steigner Occupational Safety and Health Act of 1970 (OSHA), all rules and regulations established pursuant thereto, and all amendments and supplements thereto. Subcontractor is expected to enforce its own safety program to the fullest extent relative to their scope of work. In no way does **M&M ERECTORS** release the Subcontractor of their responsibilities concerning safety issues. It shall be the responsibility of the Subcontractor to furnish and pay for any special tools and equipment required to comply with the safety standards herein stated.

A. Without limiting the foregoing, subcontractor shall specifically be expected to:

1. Require all of his employees, visitors and suppliers to wear hard hats at all times on the jobsite. Wear Safety glasses/goggles when chipping concrete, driving nails, and hitting steel on steel, etc. Workers will be properly dressed for construction when entering the jobsite.

2. All tools and equipment including ladders, platforms, lifts and scaffolding shall conform to OSHA requirements.

3. Use full body harnesses with a lanyard attached to an approved anchor point when working in areas above 6' and not protected by guardrails.

4. It if becomes necessary to have access to any opening or shaft or to remove any guardrail system, Subcontractor shall see that the openings or shafts are adequately protected while the work is in progress and that covers or guardrails are replaced before leaving the area. If a Subcontractor does not follow this procedure **M&M ERECTORS**

5. will assess a back-charge for its time and material in order to correct the problem.

6. Require his foremen and all his employees to attend weekly safety meetings. Subcontractors may attend **M&M ERECTORS** safety meetings in lieu of their own.

7. Furnish **M&M ERECTORS** with a report on any accident involving any of the subcontractor's employees or equipment as well as a copy of all Insurance and Worker's Compensation Claims involving this project.

8. Provide general contractor's superintendent with the identity of the subcontractor's competent person responsible for ensuring compliance with OSHA requirements. Provide our job superintendent with an emergency list showing your company doctor, hospital, insurance carrier, etc. Furnish the project with a first aid kit and/or send your first aid type injuries to your company **M&M ERECTORS** first aid kit will not be available to subcontractor's employees.

B. If Subcontractor's foreman and/or his employee(s) do not comply with the above **M&M ERECTORS** the authority to remove them from the project and Subcontractor agrees to provide a new foreman and/or employees(s) who will abide by the safety rules.

C. If it is necessary for **M&M ERECTORS** to loan hard hats or other safety equipment to employees of the subcontractor, their visitors or suppliers, in order to comply with state and federal law, there may be a back-charge against the subcontractor of $10/day for each hard hats or piece of safety equipment loaned. This money shall be withheld from the monthly payments due the subcontractor. Safety equipment loaned that is not returned will be also backcharged at replacement cost.

D. Subcontractor shall be responsible for providing drug-free employees to the Construction jobsite. Subcontractor warrants and agrees to advise its employees that alcohol and drugs will not be tolerated on any **M&M ERECTORS** jobsite. Subcontractor will furnish a post-accident drug test on any Subcontractor employee involved in a lost-time accident. **M&M ERECTORS** reserves the right to direct random drug testing of all Subcontractor employees on its worksite(s), if reasonable suspicion of substance abuse is being experienced on said sites. This test will be conducted as outlined in the **M&M ERECTORS** Substance Abuse Program testing procedure (copy available upon request.) If Subcontractors' employee

refuses a drug test in either case, **M&M ERECTORS** will not allow him (or her) back on the project site.

E. It shall be the responsibility of all Subcontractors to provide the appropriate Material Safety Data Sheets (MSDS) to **M&M ERECTORS** for all hazardous chemicals being used by their company at the jobsite.

_____	_____
M&M Erectors	**Subcontractor Signature**
_____	_____
Date	**Date**

Contents of the Employee Policies and Procedures

Employee Policies And Procedures

1. Written Program.

M&M ERECTORS, INC. will review and evaluate these procedures on an annual basis, or when changes occur to the regulations, when operational changes occur that require a revision of this document, when there is an accident or near miss that relates to this area of safety, or any time these procedures fail.

2. Compliance Statement.

The Policies and Procedures outlined in this "Employee Policies and Procedures Manual" are designed to help ensure the safest and most efficient Company operations possible. They are also designed to provide the maximum Team benefits and the best possible Team success, as we work together towards a common goal.

These Policies and Procedures, when followed by everyone, benefit all of us as a Team, and are what is expected of you as a member of that Team. Whenever an individual employee fails to comply with these Policies and Procedures, it not only affects that individual employee, but it also impacts on the rest of the Team and can be detrimental to everyone. Therefore, COMPLIANCE WITH EMPLOYEE POLICIES AND PROCEDURES IS MANDATORY!

3. Equal Opportunity Employer.

3.1 M&M ERECTORS, INC. , provides equal employment opportunities to, and does not discriminate against individuals, employees or applicants for employment on the basis of race, color, religion, sex, national origin, age, handicap, disability, or status of a disabled veteran of the Vietnam era in accordance and applicable federal laws. This policy applies to all terms, privileges and conditions of employment, including, but not limited to; transfer, leave of absence, compensation and training.

3.2 M&M ERECTORS, INC. , expressly prohibits any form of unlawful employee harassment based on race, color, religion, sex national origin, age, handicap, disability, or status as a disabled veteran or veteran of the Vietnam era. Improper interference with the ability of M&M ERECTORS, INC. ' s employees to perform their expected job duties will not be tolerated, and may lead to disciplinary actions being taken against the offenders, up to and including termination.

4. Attendance and Tardiness

If an employee is going to be absent for any reason, he or she must call a Project Manager as soon as they know. Please contact your Project Manager no later than thirty (30) minutes after your workday starts. Failure to make contact with a Project Manager can result in dismissal. If an employee is going to be late for any reason, he or she must call their Project Manager as soon as they know they will be late.

5. Alcohol & Drug Abuse.

The consumption, use, manufacture, dispensation, possession, distribution, promotion, provision, purchase, sale, transfer, concealment, transportation or storage of any unauthorized, illegal or controlled substances and/or substance related paraphernalia, abuse of alcohol, drugs, inhalants and other chemicals while performing company work on Company business, Company premises or customer's property is Strictly Prohibited and will result in termination. Any employee with a problem relating to either alcohol or drug abuse is encouraged to seek counseling or some other rehabilitation treatment.

6. Attitude.

Your most valuable personal qualities are patience, efficiency, loyalty, courtesy, cheerfulness, and compassion. They are necessary components of your work. Caring for the work we perform and our fellow employees is the central reason we are here. You should do everything possible to contribute toward an atmosphere of politeness, consideration and diligence.

7. Bonuses.

The Company does not have any guaranteed Bonuses as a standard part of the employee entitlements. However, the Company may, from time to time, initiate a specific Bonus for certain reasons such as Christmas or for whatever other reason the Company deems appropriate. Bonuses are not to be construed as "on-going" from year to year" They will be given if the profits continue to be appropriate.

8. Bereavement.

All employees are eligible for Bereavement leave in the event of a death in the immediate family. You will however not receive pay for the time that is missed.

9. Business Ethics:

All employees are expected to abide by the relevant professional code of ethics, and to refrain from disclosing any of the Company's confidential information at any time, during and after your employment with the Company.

10. Change of Status.

Employee personal records, as required by law and deemed essential for efficient operations by the Company, will be maintained by the Company. Employees must promptly report, to the office, any changes in any of the following: Name, Address, Telephone number, Marital Status, Dependants, or Person to notify in case of emergency.

11. Company Breaks.

Breaks are to be taken twice a day. You need to take a 10-minute at 9:00 a.m. and a 10-minute break at 2:00 p.m. if you extend your break longer you may be written up or docked pay. Please be aware of the length of time you are spending away from your job.

12. Company Property.

An employee is expected to exercise care in his or her usage of Company property, and to use such property only for properly authorized purposes. Negligence in use and care of Company property will be considered cause for suspension or dismissal. Unauthorized removal of Company property from the premises, or its conversion to personal use, will also be considered cause for suspension or dismissal. The Company may also, at its own discretion, file criminal charges against the employee, for such removal or conversion of Company property.

Company property issued to an employee must be returned to the designated Company representative at the time of the employee's termination of employment, or whenever the employee's Supervisor or Project Manager requests its return during the employee's period of employment. The cost of any Company property issued and not returned properly may be deducted from an employee's paycheck. The Company assumes no responsibility for loss or damage to the personal property of any employee.

13. Courtesy.

Employees must conduct themselves so that the safety of both themselves and fellow workers is preserved. Employees must not work in a manner that willfully obstructs or hinders another employee from completing his or her assigned duties. Customers and fellow employees should always be addressed in a courteous and professionally businesslike manner. Personal problems are not to be pursued at work.

14. Driving.

Employees driving must drive posted speed limits and passengers are only allowed to ride if there is a seatbelt. Employees are not to ride in beds of trucks or on tailgates. Seatbelts must be worn at all times when employees are operating vehicles.

15. Discipline and Discharge.

The Company retains the right to discipline and/or discharge (with or without notice) for any reason that is deemed appropriate by the Company, including, but not limited to, the reasons specified in this Policies and Procedures Manual.

16. Chain of Command.

In an effort to achieve the maximum effectiveness for resolution and time management, the following sequence of steps should be used when you have a complaint or grievance that you feel needs to be addressed.

First: Speak to your immediate Supervisor about the problem.

Second: If the issue is not resolved after speaking to your immediate Supervisor or if the complaint or grievance involves your immediate Supervisor, you should discuss the issue with your Project Manager and as a final resort with the owner.

17. Employment Status.

The employment relationship between you and M&M ERECTORS is at-will and may be terminated at anytime, at the will of and without any reason by either you or the Company. There is no requirement of notice on the part of either party. It is contrary to Company Policy to make any representation, statement, or promise that would change the "at-will" employment relationship.

18. Employee Dress Code Policy.

All employees are required to maintain the highest standards relating to personal hygiene including regular bathing and use of deodorant, brushing of teeth, and maintaining clean hands and fingernails.

18.1 You are expected to be dressed appropriately, in clean clothes that are not torn or badly worn. All shirts must have sleeves no less than four (4) inches past the shoulder. Long pants are to be worn at all times on the jobsite. If you are unsure of what is appropriate ask your Supervisor or Project Manager.

18.2 Some jobsites the customers will require all construction personnel to wear some sort of clothing identifying company of employment. A shirt or hat with the M&M ERECTORS on it will suffice. Company hats and shirts are available for purchase in the office

18.3

Foot Protection

- Approved **safety shoes shall be worn** as a minimum in all work areas.
- Approved means “Safety shoes having a rigid toe of steel or similar material” meeting the ANSI Z-41 standard and should have a defined heel for climbing.
- Visitors not assigned to work areas (i.e., consultants, auditors or vendors) may visit a work area with footwear of substantial, sturdy construction.
- Light footwear, such as sneakers, sandals, canvas, open toed, high healed or athletic type shoes are not substantial and are **NOT ALLOWED**.
- Some tasks may require additional foot protection (i.e., metatarsal or chemical protection).

- Steel-toed shoes should be worn for safety where indicated or advised. You should wear your safety shoes unless you are informed by your supervisor or someone from the office tells you that you do not have to in a specific building. If you have questions regarding this, ask your supervisor.

18.4 The wearing of jewelry should be limited to areas of the workplace in which there is little, or no danger of the jewelry getting caught or stuck in machinery or equipment and thereby causing the employee to be injured. No body piercing jewelry is allowed on jobsites.

18.5 Hair must be clean and neatly combed. It is recommended that all employees maintain their hair at all times. If you must have long hair keep it tucked under your hard hat while working on jobs.. We want you to be neat and safe.

18.6 Any bandages or dressings worn must be kept clean and changed as often as necessary. An employee with an open sore or wound should not work until it is properly attended.

18.7 **Eye Protection**

- Approved safety glasses with side shields that comply with ANSI Standard Z87.1 must be worn in **all** work activity areas including, but not limited to cranes or any equipment performing work. Safety glasses will be worn under welding hoods
- Additional protection is required when working in windy or dusty conditions or with any corrosives, hot liquids or for impact protection.
- Ordinary "home use" prescription glasses and commercial sunglasses do not meet ANSI Z87.1 and are **NOT ALLOWED** in these areas, unless worn under approved protection (i.e., goggles or visitor specs/over glasses).
- Dark tinted safety glasses will not be worn during limited periods of visibility or inside buildings.

18.7.1 **Hand Protection**

* Gloves shall be carried at all times and worn based on the service and task being performed.

18.8 **Fall Protection** Full body harnesses will be utilized in accordance with M&M Erectors fall protection program requiring 100% tie off when working at elevations above 6 foot.

18.9 Proper training on the use of fall arrest equipment is essential and will be provided prior to use.

19. Health Considerations.

All employees should show consideration for their fellow workers by following good sanitation and health practices, and taking all appropriate safeguards against spreading contagious or infectious disease. If you should become ill while at work, you should immediately report it to your Supervisor and follow the proper procedures for protecting your own health and the health of others.

20. Emergency.

All Emergency Exits are to be kept free of obstructions at all times. No materials, equipment, or objects of any kind are to ever be placed in such a manner that an Emergency Exit might be blocked or unusable, to any degree.

21. Expense Reimbursement.

An employee, who is required to use his or her own personal vehicle for Company business, will be reimbursed for such use at the rate, set each year, provided the employee submits the proper vouchers showing the date, miles traveled, and the business purpose of each trip.

22. Fighting.

Fighting will not be tolerated on Company or customer premises. Whenever a fight occurs, the Supervisor in charge of the area in which the fight occurs, is responsible for ascertaining that witnesses are present, who is involved, and immediately reporting the incident to management, along with the names of the participants and witnesses. Management will investigate and impose whatever disciplinary actions (up to the including discharge), as deems appropriate.

23. Firearms and Other Weapons.

Firearms or any other type of weapon is strictly prohibited on Company/customer premises.

24. Full-Time and Part-Time.

Any employee, who regularly works a scheduled thirty (30) hours per week, or more, is classified as a Full-Time Employee. Those employees who regularly work less than the minimum of thirty (30) hours per week will be classified as Part- Time Employees.

25. Family And Medical Leave Of 1993.

This Policy is intended to provide you with information on the Family and Medical Leave. Act of 1993 and the Company's required procedures for you to receive the benefits to which you are entitled under this law. An employee is eligible if he/she has worked for this Company for at least one year and worked for at least 1,250 hours during the previous 12 months, prior to the beginning of the requested leave period.

25.1 Eligible employees are entitled to receive up to 12 workweeks of leave-unpaid, with each 12-month period established by the Company. All eligible employees are required to use all available earned paid leave, such as vacation as the initial portion of the 12-week FMLA required leave time. Additional weeks of leave necessary to attain the 12 work weeks required by the Act will be provided without compensation.

25.2 FMLA 12 work weeks of leave may be taken only for one or more of the following:

25.2.1 Because of the birth of a child of the employee, and in order to care for such child.

25.2.2 Because of the placement of a child with the employee for adoption or foster care.

25.2.3 In order to care for the spouse, or child or parent of the employee, if such spouse or child or parent has a serious health condition.

25.2.4 Because of a serious health condition that makes the employee unable to perform the functions of his/her job.

26. General Employee Conduct.

The following actions are cause for disciplinary action up to and including termination. The examples listed below are merely an illustration of the type of conducts that will subject you to disciplinary action. The list is not all-inclusive or exhaustive.

26.1 Inefficient or careless performance of duties.

26.2 Failure to respect the confidential nature of business records or information.

26.3 Altering, removing, or destroying business records and/or property.

26.4 Derogatory remarks concerning any employee, business representative, or persons served.

26.5 Falsifying personal or business records, including employment application and/or other required employment information.

26.6 Deliberate or careless damage to materials or business property.

26.7 Repeated tardiness and unexcused absences.

26.8 Thefts of any kind from the Company, fellow employees, or customers.

26.9 Possessing, drinking, or being under the influence of Alcohol or Drugs while on Company or customer premises or while conducting IDG business and/or operating Company equipment.

26.10 Engaging in any conduct, which could endanger the safety, life, or health of others.

26.11 Personal advances and/or physical contact with other employees or persons, which is not in keeping with job duties and responsibilities, or is outside the bounds of acceptable behavior in a business setting, including sexual or other harassment.

26.12 Failure to comply with business Rules, Regulations, Policies, or Procedures.

26.13 Fighting on Company or customer premises.

26.14 Refusing to take a random drug test.

26.15 Possession of firearms or other weapons on Company or customer property.

27. Gifts.

Gifts from Vendors are received sometimes. Do not accept anything that my have large monetary value.

28. Holidays.

All full-time employees are eligible for paid holidays after 1 year of continuous working. If an employee is laid-off after first year of employment and is rehired, he/she will be eligible for holiday pay after 90 days. If the employee terminates his employment after his first year and rehires with the company, he/she must wait a full year, from the date of rehire, to be eligible for Holiday Pay. The Company observes the following six (6) designated holidays:

28.1 New Year's Day

28.2 Memorial Day

28.3 4th of July

28.4 Labor Day

28.5 Thanksgiving Day

28.6 Christmas Day

A designated holiday falling on a Saturday is observed on the preceding Friday. A designated holiday falling on a Sunday is observed on the following Monday. Employees must work the day before and after a holiday in order to receive holiday pay. There will be no exceptions to this rule. Holiday is paid straight time. No overtime pay will be made for holidays.

29. Insubordination.

Insubordination is the refusal of an order from a Supervisor or Managerial personnel. The use of obscene or objectionable language to such personnel shall also be considered insubordination. Insubordination undermines the discipline and authority needed in the workplace as well as the safety of all employees. Therefore, IT WILL NOT BE TOLERATED. Management will investigate the situation

thoroughly and impose appropriate discipline, up to and including suspension or discharge.

30. Job Assignments.

As far as practical, job duties change regularly. Each employee should be flexible, and needs to be able to comply with, the job as requires. A Project Manager will determine whether an employee is capable of doing a specific job. Your cooperation is an important factor in the performance of your work and the overall operations of our business.

31. Jury Duty.

Leaves of Absence, without pay for Jury Duty. Employees who receive notice of Jury Duty must notify their Supervisor no later than three (3) working days before the appointed Jury Duty date, so the arrangements may be made for covering their work assignments on the job.

32. Loafing.

Loafing includes, but is not limited to, sleeping on the job or intentionally slowing down on the job. Loafing employees are an undue burden on all responsible Company workers by increasing their workload. An employee who loafs is subject to disciplinary action, up to and including suspension or discharge.

33. Loitering.

There is to be No Loitering on Company/Customer premises before, during, or after an employee's work shift. Employees are not to loiter, at any time.

34. Medical Leave.

Work Related Illness or Injury. An employee who incurs a work-related injury is granted a Work-Related Medical Leave of Absence for the period of time that is certified in writing by a Company approved physician as being necessary due to the work-related injury. M&M ERECTORS is covered by Worker's Compensation Insurance and must be handled in proper order.

35. Medical Treatment.

M&M ERECTORS will pay for non-emergency medical treatment such as: cuts, tetanus shots, or other small injuries if treatment is necessary, provided they are company related.

35.1 In order to be authorized medical treatment, conditions surrounding the medical treatment, must be authorized. You must notify Management as soon as possible after the injury occurs. It must be a work related injury properly documented with the date, time, place, what you were doing at the time and witnesses that were present. You must go to the Company Doctor (call the office for assistance) as soon as the accident occurs. If you need to go to a specialist you may pick your own doctor, but the doctor needs to be a certified doctor. You will be drug tested if an accident

occurs and you need medical treatment.

35.2 Emergency Medical Treatment Procedures. Notify Management immediately. Management will take you to an emergency medical treatment facility, or will call an ambulance if necessary. The Company will notify and approve emergency medical treatment, as the situation requires. Required forms and reports must be completed as soon as the emergency requirements have been met. Company personnel will assist you as far as possible to insure that you receive proper emergency medical treatment. If you have any questions regarding an injury, please call the office.

36. Moonlighting.

Moonlighting is allowed only if it does not interfere with the Company workload. The Company's work requirements, including Company overtime, will have precedence over part-time employment elsewhere.

37. Open Door.

It is M&M ERECTORS policy to encourage employees to freely discuss work requirements, conditions under which work is performed, and/or ideas, which can benefit all of us, with a representative of Management.

38. Overtime.

Overtime is the time in excess of forty (40) hours that an employee actually works within a one-week pay period.

39. Pay Days/ Periods.

The regular weekly pay period is Monday through Sunday, inclusive. The regular Payday is the Friday, immediately following the close of the regular weekly pay period. If an official Company Holiday falls on a regularly scheduled Payday, the Payday in that case will be the last working day before the Holiday.

39.1 A terminated employee will be paid in full no later than six (6) working days after termination. An employee who resigns will be paid in full no later than the next regularly scheduled Payday following their last day of employment.

39.2 Paychecks will not be given to an unauthorized employee unless we receive a call or written notice from the employee personally.

40. Probationary Period.

All new employees will be considered probationary employees for the first (90) days of their employment. The purpose of the probationary period is to give the new employee an opportunity to evaluate the job and determine whether the work is suitable and to allow the Supervisor to observe the new employee's job performance, safety habits, attendance, and ability to get along with others. A new

employee who, during this trial period, proves to be unsuited or not qualified to meet the requirements of the job will be terminated. Satisfactory completion of the probationary period does not alter your status as an employee-at-will. You will not receive a raise after your (90) days of probation.

41. Supervisors.

Questions about your job, pay benefits, relations with your associates, policies and procedures or the operation in general will be directed to your Supervisor. Look to your Supervisor for guidance and seek his/her assistance when you encounter difficulties. Cooperation and communication with your Supervisor will promote a mutually beneficial work environment.

41.1 Each employee must follow the directions of his/her Supervisor. Your Supervisor is responsible for directing your work throughout your day, evaluating your performance, providing instruction and guidance in your job; and taking any disciplinary action that may be necessary. Disrespect for their authority will not be tolerated and may result in disciplinary action up to and including termination.

42. Smoking.

The Company discourages its employees from smoking, since it is regarded as a poor health habit. Smoking is permitted, however, during morning and afternoon breaks, and during lunch periods. All smoking must be done in designated smoking areas only.

43. Safety.

All employees are required to take a safety class when hired. The Company needs for all employees to be "SAFETY CONSCIOUS" and to assist the company in finding conditions on the premises that might cause an accident. All employees must wear proper required Safety equipment at all times. All employees must follow all safety policies, rule, regulations, and procedures at all times! ! You will be given a Safety Policies, Rule, Regulations and Procedures Manual. Compliance with them is mandatory for everyone.

43.1 Housekeeping and a Neat Work Area: A neat work area makes a more pleasant and safer place to work. All employees are to help keep the work areas neat and as safe as possible. Trash, scrap metal, etc., is to be picked up at all times. Employees are required to follow all Health, Safety, and Fire Prevention Policies and Procedures.

44. Safety Violations Policy.

Our Company is dedicated in providing a workplace free of safety and health hazards for our employees. In order to achieve this goal, every employee MUST comply with all Safety Policies and Procedures. Failure to do so, by any employee at any time, is to compromise our Company's objectives and to possibly endanger the welfare of fellow employees or yourself. Our Safety Policies, Procedures, and

Training Requirements are also the law, as mandated by federal and/or state regulations.

44.1 Our Company also makes every endeavor possible to ascertain that every employee clearly knows and understands what is expected of them in the capacity as our employee, and in their specific job assignments. . Our first emphasis is on education, training, and positive guidance. However, certain conditions call for disciplinary measures. In those cases, the following discipline will apply.

44.2 Discipline process for safety violations (Within any 12-Month Period)

44.2.1 FIRST VIOLATION: Verbal Warning, and possible re-training

44.2.2 SECOND VIOLATION: Written Warning or Documented Verbal Warning and possible re-training. (Warning will be documented as permanent part of employee's personnel file).

44.2.3 THIRD VIOLATION: Probation or Suspension, without pay, for up to 5 work days. (This discipline will also be recorded as a permanent part of the employee's personnel file).

44.2.4 FOURTH VIOLATION: **TERMINATION**

44.3 All Safety Violation Disciplinary Actions Are To Be Coordinated With The Safety Director And The Personnel Department, To Insure Accurate And Required Documentation.

SPECIAL NOTE: Any of the above discipline measures are to be considered the MINIMUM for Safety Violations, and the Company reserves the right to escalate the level of the disciplinary action for any particular Safety Violation, as the impact of any single Safety Violation may have the potential to be devastating to individuals and/or Company. Therefore, event the First Safety Violation could result in Termination, depending on the circumstances. The Company shall be the sole judge in making such determinations.

45. Sexual Harassment.

This Company believes that each individual employed by M&M ERECTORS has the right to be free from all forms of unlawful harassment including harassment because of sex, race, color, religion, national origin, or age. (This pertains to all employees.)

45.1 All employees are responsible for assuring that the work environment is free from all forms of unlawful harassment including sexual harassment. Sexual harassment is defined as sexual advances, requests for sexual favors and other verbal or physical conduct of sexual nature, when:

45.1.1 Submission to the harassment is made a condition of employment;

45.1.2 Submission to the harassment is used as the basis for employment decisions; or

45.1.3 The harassment has the effect of interfering with an individual's work performance or creating an intimidating hostile, or offensive work environment.

45.2 Sexual harassment can come from supervisors, fellow employees, or customers. Men as well as women can be victims of Sexual Harassment. We cannot stress enough that M&M ERECTORS will not tolerate any form of Sexual Harassment.

45.3 Complaints of Sexual Harassment against employees are to be brought immediately to Management. Management will investigate the matter promptly, and if the allegation is sustained, the responsible employee will be disciplined up to and including discharge. In addition, any complaint of Sexual Harassment against a visitor or customer should be reported to Management immediately. If you have a complaint or believe that you are being subjected to Sexual Harassment by your Supervisor, you should report the complaint to a Management representative above your Supervisor. Each complaint will be received in confidence and investigated promptly, thoroughly, and in a manner, which will protect the privacy of all parties concerned.

46. Termination.

The termination of any employee of M&M ERECTORS, INC will be administered from a member of Management Team. All actions concerning the termination of an employee will be discussed before termination is activated. When a layoff occurs, the employee must return within 90 days to be eligible to resume the same benefits (original hire date) otherwise we will use a rehire date for benefits.

47. Time Cards.

Each employee will be given a time card with his or her name, and employee number preprinted on it. You will be expected to make copies of the original and turn one in each week. You will be responsible for turning your card in at the office. Do not depend on anyone else to do this for you. If you are not scheduled to work any overtime on the weekend you need to turn your timecard in Friday when you pick up your check. Each day you need to have the Supervisor you are working with that day initial your timecard to verify that the hours worked are correct. Failure to follow this Policy and Procedural requirements can result in disciplinary action, up to and including termination. Failure to turn in time card will result in pay on the following pay period, no exceptions.

Remember you are responsible for your time being correct. Verify your time before turning your time card in.

48. Vacations-Paid.

48.1 It is this Company's policy to grant Vacations, with pay, to provide qualifying employees with periods for rest and recreation, in recognition of service rendered to the Company. Only regular Full-time employees may

be eligible for full paid Vacation time.

48.1.1 After you have been in service with M&M ERECTORS for a term of one (I) year, you will become eligible for one (I) weeks paid vacation. If you do not work for the Company for a full year, you will lose the vacation time accrued. If an employee is laid-off after first year of employment and is rehired, he/she will be eligible for holiday pay after 90 days. If the employee terminates his employment after his first year and rehires with the company, he/she must wait a full year, from the date of rehire, to be eligible for Vacation Pay.

48.1.2 You must turn in a vacation request *form* two weeks prior to the time you would like to take vacation. The form has to be signed off by one of the members of management. You cannot take vacation unless it is approved.

48.1.3 All requests for vacation will be considered based upon the Company's schedules, and may be denied if such a number of employees desire the same or overlapping periods of time off, so as to significantly impair the Company's working schedules. Priority in granting vacation requests will be given based on an employee's seniority in continuous length of employment with the Company, and on a first-come basis for the submission of your request. You will have 15 months to use your vacation time. If it is not used, you will lose it. After 10 years of service with IDG, an employee will be given 2 weeks paid vacation.

49. Working Hours.

Normal work hours are from 7am - 4pm. Our workweek may be determined from time to time by the job or customer. The workday is defined by what is normally required to complete the daily schedule. Personnel shall work the hours assigned by the supervisor. Work schedules may change from day to day. We reserve the right to change schedules for employees in the interest of proper functioning of the business.

SUBJECT: Substance Abuse Policy

GENERAL: M&M ERECTORS has maintained a Drug and Alcohol Policy for number of years and is committed as a matter of policy to having a workforce and workplace that is free from unauthorized, prohibited, illegal, or controlled substances; including Alcohol, Drugs, Inhalants, and other chemicals.

Involvement with controlled substances, Alcohol, drugs, Inhalants, or other chemicals can take its toll on job performance and can endanger other employees, compromise the safety and security of Company operations and assets, as well as harm and endanger the abuser. THE COMPANY EXPECTS ALL EMPLOYEES TO PERFORM THEIR DUTIES SAFELY AND EFFICIENTLY. Everyone and everything is adversely affected by the use or abuse of unauthorized, prohibited, and illegal or controlled substances including Alcohol, Drugs, Inhalants and other chemicals. Therefore, the Company takes its commitment for a safe and Drug-Free and Alcohol-Free work environment very seriously.

Contents of the Substance Abuse Policy

SUBSTANCE ABUSE POLICY

1. Policy Statement.

AS A TERM AND CONDITION OF EMPLOYMENT AND/OR THE PRIVILEGE OF ENTERING ONTO OR REMAINING ON COMPANY PREMISES, OR PERFORMING COMPANY WORK, OR OPERATING COMPANY VEHICLES, THE COMPANY REQUIRES ALL EMPLOYEES TO ADHERE TO THE FOLLOWING:

1.1 Employees are prohibited from engaging in any activity that would contradict the policy to have a workforce and workplace FREE from unauthorized, prohibited, illegal, or controlled substances, including Alcohol, Drugs, Inhalants, and other chemicals.

1.2 All employees are expected to be fit for duty and in a condition to carry out their assignments and responsibilities in a safe and efficient manner. It is therefore a violation of the Policy to work or to even be on Company premises or operating Company vehicle while under the influence of unauthorized, prohibited, illegal, or controlled substances, including Alcohol, Drugs, Inhalants, or other chemicals, OR to have a detectable level of Alcohol or unauthorized, prohibited, illegal or controlled substance present in their systems.

1.3 The consumption, use, manufacture, dispensation, possession, distribution, promotion, provision, purchase, sale, transfer, concealment, transportation or storage of ANY **unauthorized, prohibited illegal, or controlled substances and/or substance-related paraphernalia while performing Company work, on Company assignment, in Company vehicles, or on Company premises, is** STRICTLY PROHIBITTED AND WILL RESULT IN TERMINATION OF EMPLOYMENT. **Any unauthorized, prohibited, illegal or controlled substances or paraphernalia found on Company property may be turned over to appropriate law enforcement authorities and criminal charges may result.**

1.4 Any employee whose off-duty involvement with unauthorized, prohibited, illegal, or controlled substances becomes known to the Company may be considered to be in violation of Company Policy. In deciding what action to take, the Company will take into consideration the circumstances of such involvement, whether or not the employee has voluntarily entered into and is fully participating in a rehabilitation program, the employee's present job assignment and record with the Company, and any adverse effect the employee's actions may have on the Company, including reputation.

1.5 Company employees are expected to cooperate with Company-mandated substance abuse testing programs and policies and with Company-

mandated searches. Refusal to cooperate with such testing or searches will result in termination of employment. Attempts to destroy or tamper with Drug- testing specimens, records, or to alter specimens will result in termination of employment.

1.6 An employee must notify the Company immediately that he or she is using a prescription or over-the-counter product (whether physician-approved or not) which may affect work performance by altering the mind, mood, behavior, emotions, reasoning, performance, alertness or physical functions of the employee; to ensure that such use does not jeopardize safe job performance requirements for the specific job assignment of the employee. This information will not be used to discriminate against you.

1.7 ANY EMPLOYEE WHO FAILS TO COMPLY WITH THE REQUIREMENTS OF THIS POLICY, IN PART OR IN WHOLE, WITH EITHER THE PRECEEDING LISTED REQUIREMENTS OR THE FOLLOWING LISTED REQUIREMENTS WILL BE SUBJECT TO DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION. AN EMPLOYEE WHO HAS A DRUG OR ALCOHOL RELATED PROBLEM SHOULD SEEK ASSISTANCE, AS THE COMPANY PREFERS REHABILITATION. HOWEVER, IF THE EMPLOYEE'S CONDUCT HAS LED TO DISCIPLINARY ACTION, SUCH ACTION CANNOT BE AVOIDED BY A REQUEST FOR ASSISTANCE.

2. Substance Testing For Pre-Employment, New Hires and Reinstatements.

2.1 As a term and condition of employment, applicants, new-hires, and person seeking to return to work or being reinstated after a layoff, suspension or any other type of payroll separation, regardless of length of time of such separation or how re-employment or reinstatement occurs, will be subject to substance testing. A positive substance test will terminate employment or Re-employment proceedings.

2.2 SUBSTANCE TESTING FOR EMPLOYEES ON LEAVES OF ABSENCE. In keeping with the intent of the overall Company "DRUGS, ALCOHOL, CHEMICALS AND SUBSTANCES IN THE WORKFORCE AND WORKPLACE POLICY" to having employees and a workforce and workplace free from unauthorized, prohibited, illegal, or controlled substances; including Alcohol, Drugs, Inhalants, and other chemicals; the following rules apply to employees who are on a Leave of Absence and continue to be carried on the Company Employee Roster and/or the Company Payroll Roster.

2.2.1 EMPLOYEES RETURNING TO WORK FROM A LEAVE OF ABSENCE: As a term and condition of employment and/or the privilege of entering onto or remaining on Company premises, or performing Company work, the employee who is on a Leave of

Absence and who is returning to the active workforce from such a Leave of Absence (regardless of whether the Leave of Absence is a Non-Medical Leave, a Non-Work Related Medical Leave, or a Work Related Leave) will be subject to substance testing before the employee can return to the active, workforce or perform Company work, regardless of whether the pending work is for light or limited work duty or for regular work duty. REFUSAL TO COMPLY WITH SUCH SUBSTANCE TESTING POLICIES, OR A POSITIVE SUBSTANCE TEST RESULT, (as defined in the Substance Testing Procedures section of this Company Policy) WILL TERMINATE ANY RETURN TO ACTIVE WORK PROCEEDINGS, AND WILL TERMINATE THE EMPLOYMENT STATUS OF THE INDIVIDUAL.

2.2.2 EMPLOYEES ON A WORK-RELATED MEDICAL LEAVE OF ABSENCE: As a term and condition of employment and/or the receipt of "lost time pay", the employee who is on a Work-Related Medical Leave of Absence and who is not active in the workforce or workplace, remains subject to all of the terms and conditions of the Company's "DRUG, ALCOHOL, CHEMICALS AND SUBSTANCES IN THE WORKFORCE AND WORKPLACE POLICY", and pursuant to Item #4 page 2 of this Policy, such employee, will be subject to substance testing, at the Company's discretion. REFUSAL TO COMPLY WITH SUCH SUBSTANCE TESTING POLICIES, OR A POSITIVE SUBTANCE TEST RESULT, (as defined in the Substance Testing Procedures section of this Company Policy) WILL TERMINATE '"LOST TIME PAY" ELIGIBILITY, AND WILL TERMINATE THE EMPLOYMENT STATUS OF THE INDIVIDUAL.

3. For Cause- Post Accident/Incident Testing.

3.1 REASONABLE SUSPICION/BELIEF TESTING: Employees may be subject to "FOR-CAUSE" substance testing under the following illustrative conditions:

3.1.1 After an ACCIDENT, INCIDENT OR SAFETY VIOLATION (Note: the use or abuse of substances major may not be apparent.)

3.1.2 **When** job performance appears to have changed or become erratic or impaired**.**

3.1.3 When, in the Company's opinion, an employee's actions or inaction or appearance indicated possible use or abuse of unauthorized, prohibited, and illegal or controlled substances.

3.1.4 If there is a reasonable cause, suspicion or belief that an employee may be using or abusing unauthorized, prohibited, illegal, or controlled substances.

3.1.5 Other instance in which the Company states a basis for believing

the employee is using or abusing substances in connection with the workforce or workplace.

3.2 UNANNOUNCED PERIODIC TESTING AND RANDOM TESTING: Due to the nature of some of the Company's safety-sensitive work assignments, the widespread availability and use of abuse of unauthorized, prohibited, illegal or controlled substances in the United States, and M&M ERECTORS commitment to maintain a Alcohol-Free and a Drug-Free workforce and workplace, ALL employees will be subject to unannounced periodic testing unless prohibited by statue or regulation. Random testing will be conducted as permitted by statue or regulation. These tests will be given without cause, suspicion, detectable performance problems, or the occurrence of an accident, incident, or safety violation.

3.3 MAINTENANCE TESTING AFTER REHABILITATION: Employees will be subject to follow-up, post-rehabilitation testing if they are returned to work after substance rehabilitation, for a five-year period thereafter, or in accordance with applicable law. If at any time during or after the post-rehabilitation testing period, an employee is substance tested for any reason and the test is confirmed to be "positive", the employee will be terminated.

4. Substance Testing Procedures.

M&M ERECTORS Safety Director, or other duly authorized agent of the Company will serve as the Company's Testing Officer(s) and will make all testing and medical services arrangements for employees.

4.1 The Company will use, at its discretion, either on-site specimen collection and initial testing procedures; or on-site specimen collection with off-site medical laboratory testing procedures; or off-site specimen collection and testing procedures; or a combination of the above, whichever the Company deems appropriate at any time. Regardless of the method used, strict procedures will be used to safeguard the chain of custody of the specimen(s) and the confidentiality of the results. Employees may be asked by collection-site personnel to indicate whether there is a potential that they will test positive for prescription or other substances. A consent and specimen identification form will be required for each testing specimen.

4.2 If an employee fails to provide an acceptable testing specimen, the Company may take any of the following steps:

4.2.1 Extend the stay of the employee at the designated collection site, if feasible, until an acceptable specimen is collected.

4.2.2 Reschedule the test due to unusual circumstances, i.e., post-operative situations.

4.2.3 Discipline the employee up to and including termination of employment for refusing to provide a timely acceptable specimen.

4.3 **All positive initial test results** will be confirmed **by standard laboratory procedures,** and if such substance(s) is present, will be reported as a "positive test" regardless of the detection level.

4.4 Initial testing specimen(s) may constitute one or more of such samples as saliva, urine, Breathalyzer, or other generally non-invasive sample(s). A "positive test" of this initial specimen will be followed by a reliable laboratory or instrument testing procedure for confirmation. All laboratory or medical testing will be performed by licensed and accredited medical personnel and/or facilities. This laboratory or instrument testing procedure may be performed on the original specimen, split specimen, or an additional specimen sample such as blood or other sample, whichever method the Company deems appropriate. M&M ERECTORS reserves the right to request such additional testing specimen(s), including a blood test. Refusal to comply with such a request is a violation of this policy.

4.5 A POSITIVE SUBSTANCE TEST WILL RESULT IN TERMINATION OF EMPLOYEMENT.

5. Prescription Medicines And Over-The-Counter Products.

5.1 Employees are to be aware of the actions and side effects of all substances, which they use. Certain medications and over-the-counter products, when used as prescribed or in accordance with manufacturer's directions, do not typically adversely affect work performance. Employees are not required to report such substances to the Company.

5.2 However, if there is any doubt about whether the substance can be safely used in the workplace, or if the substance is known to affect or have the potential to affect work performance, even when used according to prescription or manufacturer's directions, the employee must directly or through his or her Supervisor notify the Company Safety Director, who will make a determination as to what, if any, work restrictions would apply.

5.3 REQUIREMENTS FOR PRESCRIPTIONS AND OVER-THE-COUNTER PRODUCTS USED IN THE WORKPLACE:

5.3.1 Prescriptions and over-the-counter products are to be kept in the labeled prescription container, provided by the pharmacist when the prescriptions was issued, or the original manufacturer's labeled container in the case of an over- the counter product. All prescriptions are to be dated, in the employee's name, and have the prescribing physician's name and prescription number on the

label.

5.3.2 Prescription and over-the-counter products are to be used in a manner consistent with the instructions of the prescribing physician or as documented in the manufacturer's instructions.

5.3.3 Only the employee whose name appears on the prescribed label can use the prescribed medication; no other employee may consume or be allowed to consume the prescribed medicine.

6. Post Accident/Incident And Random Substance Testing Procedures.

6.1 All "involved employees" and witnesses MUST immediately report the Accident/Incident to their Supervisor. The Supervisor MUST, in turn, immediately report the Accident/Incident to the Safety **Director or his representative. If the employee's Supervisor is not immediately available, the employee MUST** immediately report it directly to the Safety Director of his representative.

Note: "Involved employees" are defined as any employee who is, either directly or indirectly, involved in a mishap as an injured party, non-injured participant, and/or an operator or passenger in, on, or of equipment or a vehicle involved in the Accident/Incident.

6.2 All "involved employees" MUST complete the "INCIDENT REPORT FORM" immediately following the Accident/Incident.

6.3 The Safety Director or his representative will make all medical arrangements for the affected employee(s). It is also the employee's responsibility (unless prohibited by the seriousness of the injury) to communicate with the Safety Director or his representative for obtaining medical care and further instructions.

6.4 "Involved employee's" in Accidents/incidents appearing to be of nature which would prevent the injured employee(s) from reporting to work the following day, or prevent him or her from completing the remainder of the current work day (lost-time accident) may be required, at the sole decision of the Company, to under-go substance testing.

Note: Since the impact of an Accident/incident may not be readily discernible, however, the Company reserves the right to require substance testing following ANY Accident/Incident, whenever the Company deem it the prudent thing to do.

6.5 DO NOT INGEST ANY MEDICATION, prior to substance testing, following an Accident/Incident unless deemed necessary and administered by (authorized medical personnel. Such ingested medication could alter the results of a substance test and thereby cause the employee's test result to be positive.

6.6 The timing, method, and location for collecting substance testing specimen and/or conducting substance testing will be determined by the Safety Director or his representative, (in conjunction with authorized medical personnel's recommendations, when appropriate).

6.7 Employees who refuse to follow the preceding outlined Procedures and/or refuse to submit to submit to Substance Testing will be subject to disciplinary action, up to and including termination of employment.

7. Random Substance Testing.

Random substance testing may be initiated pursuant to the "DRUGS, ALCOHOL, CHEMICALS AND SUBSTANCES IN THE WORKFORCE AND WORKPLACE POLICY". ANY EMPLOYEES SELECTED AT RANDOM WILL SUBMIT TO A SUBSTANCE TEST. Any employee who refuses to do so will be subject to disciplinary action, up to and including termination of employment.

7.1 COMPLIANCE WITH THE DRUGS, ALCOHOL, CHEMICALS AND SUBSTANCES IN THE WORKFORCE AND WORKPLACE POLICY IS MANDATORY.

7.2 NOTICE OF RANDOM SUBSTANCE TESTING PROCEDURES:

7.2.1 In accordance with our Company's "DRUGS, ALCOHOL, CHEMICALS AND SUBSTANCES IN THE WORKFORCE AND WORKPLACE POLICY", **a Company-wide** Random Substance Testing Program **will be in effect. All employees may be subject to Random Drug Screens at anytime of employment when deemed necessary.**

7.2.2 The Safety Director will notify the selected employees and their Supervisors of their Random Substance Testing requirements.

SUBJECT: Safety Program Responsibilities

GENERAL: M&M ERECTORS has established a comprehensive, site company specific Safety Program. The ultimate purpose of the Program is to protect the greatest asset of the company: it's employees. Specifically, the M&M ERECTORS safety program has been designed to address the issues of evaluating potential hazards associated with our work, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

The purpose of this document is to outline the responsibilities of each level of management and employees within M&M ERECTORS The company expects all employees to be familiar with the contents of this document as they pertain to their specific place in the company.

Contents of the Safety Program Responsibilities

SUBJECT: Contractor Safety Policy

REGULATORY STANDARDS: OSHA - 29 CFR 1926 and 1910 (Selected portions)

GENERAL: M&M ERECTORS will ensure that the hazards of all jobsites are evaluated and that information concerning their hazards is transmitted to all employees and contractors. In addition, we recognize that good communication is a necessary element of maintaining safety at construction sites. Communication among subcontractor groups must identify safety hazards and prevention practices that each brings to the worksite. Therefore, M&M ERECTORS has implemented the following contractor safety program for our worksites so that on the job injuries are minimized and work practices may be standardized.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who has the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received the fall protection training before working in any areas where fall hazards exist. Subcontractors will be required to provide a written fall protection program which describes the subcontractors fall protection policies and procedures when they will be working at elevated heights.

Contents of the Contractor Safety Policy

CONTRACTOR SAFETY POLICY

1. Written Program.

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

1.1 Provide a safe working environment.

1.2 Govern facility relationships with outside contractors.

1.3 Ensure that contractor employees and our employees are trained to protect themselves from all potential and existing hazards.

1.4 The effectiveness of the contractor safety program depends upon the active support and involvement of all employees. This plan is intended to implement a program to ensure that all contractor work practices are carried out safely to minimize the possibility of injury or harm to the contractor's employees or our own employees. It is intended to serve as an additional tool in safeguarding the health and safety of employees.

1.5 The contractor safety policy establishes uniform requirements designed to ensure that contractor safety orientation, coordination, and safety administration practices are communicated to and understood by employees.

1.6 If employees have any questions of what is expected from them they should ask their Supervisor or contact the Safety Manager.

1.7 This document is provided to ensure all corporate safety plans, policies and procedures are communicated to all participating contractors. It also provides an avenue for contractors to communicate their safety plans, policies and procedures to the company. This program aims to prevent personal injuries and illnesses.

2. Training Requirements.

2.1 Company Requirements. M&M ERECTORS makes sure that affected company employees receive training on all hazards to which they will be introduced by a contractor. In addition, we emphasize to the contractor that it is the contractor's responsibility to convey to its employees any safety information provided by the company to the contractor.

2.2 Contractor Requirements

2.2.1 The contractor must:

2.2.2 Train all workers on all Safety and health hazards and provisions applicable to the type of work being done, and provide documentation of such training to this company's designated

representative.

2.2.3 Train employees on where to obtain first aid and medical services.

2.2.4 Fall Protection, Ladder and Stairway Safety, and Fire Protection.

3. Administrative Duties.

Our Safety Manager is responsible for developing and maintaining the program. Employees may review a copy of the plan. It is located in the Management Office and/or each jobsite. In addition, the Safety Manager is responsible for maintaining any records related to the contractor safety program.

3.1 If after reading this program, you find that improvements can be made, please contact the Safety Manager. We encourage all suggestions because we are committed to the success of our contractor safety program. We strive for clear understanding, safe behavior, and involvement from every level of our company.

4. Responsibilities.

4.1 Company Responsibilities. This company has specific safety responsibilities when hiring contractors to come onto the worksite, onto the grounds, or into a building or facility to perform work. Company responsibilities when hiring contractors include the following listed steps. The company will:

4.1.1 Take steps to protect contract workers who perform work on or near a potentially hazardous process.

4.1.2 Obtain and evaluate information regarding the contract employer's safety performance and programs.

4.1.3 Inform the contractor of known potential fire, explosion, or toxic release hazards related to the contractor's work and the process.

4.1.4 Explain the applicable provisions of the emergency action plan to the contractor, and require that the contractor disperse that information to a worker who will work at this site.

4.1.5 Develop and implement safe work practice procedures to control contract employee entry into hazardous work areas.

4.1.6 Maintain a contract employee injury and illness log.

4.1.7 Periodically evaluate the contract employer's fulfillment of his or her responsibilities under this policy.

4.1.8 Hire and use only contractors who meet Contractor Selection Criteria as listed in the next section of this policy.

4.2 M&M ERECTORS will review all sub-contractors safety programs and OSHA 300 logs before hiring to do a project.

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

4.3.1 Assure that the contract employee is trained in the work practices necessary to safely perform his or her job.

4.3.2 Instruct the contract employee in the potential fire, explosion, or toxic release hazards related to his or her job and the process.

4.3.3 Assure that the contract employee knows the applicable provisions of the emergency action plan.

4.3.4 Document contract employee training.

4.3.5 Inform contract employees of and then enforce safety rules of the facility, particularly those implemented to control the hazards of the contracted process during operations.

4.3.6 Require that all subcontractors abide by the same rules to which the contractor is bound by this section.

4.3.7 Abide by the facility smoking rules. Smoking is prohibited in certain areas of our projects.

5. Contractor Safety Guidelines.

The following listed steps are the standard procedures for evaluating and choosing contractors who will work on-site for this company.

5.1 Obtain and evaluate information regarding a contractor employer's safety performance and programs when selecting a contractor to perform any type of contract work that might bring them into contact with any hazardous chemical or process on the premises of this company.

5.2 In an effort to determine past safety performance, the group or individual selecting the contractor should consider the contractor's:

5.2.1 Employee injury records such as Experience Modification Rate (EMR or MOD) for workers' compensation for the past three years and the contractors' past safety record in performing jobs of a similar nature.

5.2.2 OSHA log, which includes the injury and illness rates (number of lost-time accident cases, number of recordable cases, number of restricted workday cases, number of fatalities) for the past three years-

5.2.3 Incident rates for lost time accidents and recordables for the past three years, as well as the written safety program and training

system.

5.3 For contractors whose safety performance on the job is not known, obtain information on contractor references, injury and illness rates and experience.

5.4 Contractor work methods and experience should be evaluated. Ensure that for the job in question the contractor and its employees have the appropriate:

5.4.1 Job skills.

5.4.2 Equipment.

5.4.3 Knowledge, experience, and expertise-

5.4.4 Any permits, licenses, certifications, or skilled trades people necessary to be capable of performing the work in question.

5.5 The contractor must be willing and able to provide a current certificate of insurance for workers' compensation and general liability coverage with the contracting company.

5.6 Each contractor must be responsible for ensuring that its' employees comply with all applicable local, state, and federal safety requirements, as well as with any safety rules and regulations set forth by this company, at which it is performing the contracted work.

5.7 Possible ways to determine past compliance with such safety regulations include:

5.7.1 Requesting copies of any citations for violations occurring within the last three years, to determine the frequency and type of safety laws violated-

5.7.2 Having all bidders on jobs describe in detail in writing any safety programs in place at the contractor, infractions, accidents, and workers' compensation claims within the last three years. This information will provide M&M ERECTORS with a solid background on that contractor's safety performance and adherence to safety rules and regulations.

6. Information Exchange Guidelines

6.1 Before contract work begins, this company must:

6.1.1 Designate a representative to coordinate and communicate all safety and health issues and communicate with the contractor. The designated representative will have a copy of the work document, be thoroughly familiar with its' contents, and with the safety and health aspects of the work, or know who to call to obtain this information. The designated representative is responsible for

ensuring that all company responsibilities listed below are carried out.

6.1.2 Provide a copy of the facilities written safety policies and procedures to the contractor.

6.1.3 Inform the contractor of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be given the telephone numbers of the nearest hospital, ambulance service, and fire department.

6.1.4 Conduct an inspection of the proposed worksite area before the pre-start-up meeting so any known information about on-site hazards, particularly non- obvious hazards, are documented and thoroughly communicated to the contractor.

6.1.5 Work directly with the contractor's designated representative, with whom all contacts should be made.

6.1.6 Conduct a pre-start-up meeting (walk through) with the contractor's designated representative and a supervisor from each of the areas of the plant involved in the contractor's work.

6.1.7 Review all contract requirements related to safety and health with the contractor's designated representative, including, but not limited to, rules and procedures, personal protective equipment (PPE), and special work permits or specialized work procedures. Advise the contractor that the facility safety and health policies must be followed. A copy of the facility's safety plans must be furnished to the contractor.

6.1.8 Inform contractor's designated representative of the required response to employee alarms and furnish the contractor with a demonstration or explanation of the alarms.

6.1.9 Communicate thoroughly with the contractor's designated representative any safety and health hazards (particularly non-obvious hazards and hazard communication issues) known to be associated with the work, including those in areas adjacent to the worksite. Tell them it is the contractor's responsibility to convey this information to its employees.

6.1.10 Review preparation of worksite before contractor begins initial work.

6.1.11 Ensure that all affected employees at this company receive training on all hazards to which they will be introduced by a contractor.

6.2 During the contract work, this company must:

6.2.1 Limit, as necessary, the entry of company employees into contractor work areas.

6.2.2 Monitor the contractor's compliance with the contract throughout the duration of the work. When checking contractor work during the project, note any negligent or unlawful act or condition in violation of safety standards or requirements. Any items noted should be brought immediately to the attention of the contractor's designated representative in writing, with a copy of the notice being sent to the contractor's home office concurrently. However, if an unsafe act or a condition is noted that creates an imminent danger of serious injury, immediate steps should be taken with the contractor's designated representative, or in his or her absence, the contractor's employees to stop the unsafe act or condition. Do not allow work that is in violation of a regulation to continue.

6.2.3 Document all discussions, including place, time, and names of contractor employees in attendance.

6.2.4 Approve the contractor beginning work each day, unless it is routine service or maintenance work or periodic outdoor service or maintenance work.

6.2.5 For work for which this company has developed specific and generally applicable procedures, make sure contractors and their subcontractors follow the same procedures.

6.2.6 Do not allow loaning of tools and equipment to outside contractors and their subcontractors. The contractor is required to provide the necessary tools and equipment.

6.2.7 Contact the nearest medical facilities, when available, in emergency situations where severity of the injury dictates immediate attention.

6.2.8 Obtain a copy of each OSHA recordable injury report from the contractor and subcontractor. Investigate and report to the jobsite Supervisor all personal injuries to contractor and subcontractor employees.

6.2.9 Investigate and report any property losses. Maintain a contractor accident report file.

6.3 After conclusion of the contract work, our Safety Manager completes a post-project assessment of the contractor's safety performance for the facility manager to be used for future reference, with a recommendation on whether or not to re-hire the contractor.

7. Contractor Guidelines for Information Exchange.

7.1 Before the contract work begins, the contractor must:

7.1.1 Designate a representative to coordinate all safety and health issues and communicate with this company's designated

representative.

7.1.2 Provide documentation of any necessary safety training, as described in the Training Requirements section of this policy, to this company's designated representative.

7.1.3 Provide information to the designated representative on the safety and health hazards that may arise during the course of the contractor's wok at this company and the means necessary to avoid danger from those hazards, including Hazard Communication and all other potential hazards.

7.1.4 Obtain from this company any safety rules and regulation in effect at the site or potential hazards present that may affect the contractors' work.

7.1.5 Be certain to be informed of any emergency signals and procedures that may be put into operation in areas where the contractor's employees are working. The contractor should be certain to have the telephone numbers of the nearest hospital, ambulance service, and fire department.

7.1.6 Advise and train its employees on hazards associated with the work to be performed, including any Hazard Communication or other hazard information provided to contractor by this company's designated representative.

7.1.7 Keep the designated representative of this company fully informed of any work that may affect the safety of this company's employees or property. This includes complying with the state and federal right-to-know legislation and providing the designated representative appropriate material safety data sheets (MSDS) or other required information about chemicals the contractor will bring onto the site.

7.1.8 Know who to call and what to do in emergencies, including where first aid and medical services are located and train employees on this.

7.2 During the contract work, the contractor will:

7.2.1 Have a designated site Safety coordinator present and attentive to the work being carried out at all times when the contractors and/or subcontractors are working at the facility site.

7.2.2 Ensure that all subcontractors are abiding by the terms of this plan.

7.2.3 Perform its work while the jobsite is operating, if necessary, and establish necessary safe practices to permit work under operating conditions without endangering this company's employees and property. This includes but is not limited to barricading, sign-posting, and fire watches.

7.2.4 Make sure that any equipment, chemicals, or procedures used by the contractor to perform contracted work meet all OSHA requirements.

7.2.5 Be held responsible and accountable for any losses or damages suffered by this company and/or its employees as a result of contractor negligence.

7.2.6 Provide its employees with medical care and first-aid treatment. M&M ERECTORS first-aid facilities may be used only in case of emergencies.

7.2.7 Use only the plant or building entrance designated, and follow the facility access control practice. The contractor also will ensure that each contractor employee is issued and wears some form of easily seen identification.

7.2.8 Provide supervisors and employees who are competent and adequately trained, including training in all health and safety aspects of the work involved in the contract.

7.2.9 Provide all tools and equipment for the task at hand, including personal protective equipment (PPE). Contractors must ensure that all employees are instructed in its proper use and that all equipment, tools and (PPE) issued is in proper working order.

7.2.10 Maintain good housekeeping in the workplace.

7.2.11 Follow specific instructions supplied by this company should emergency alarms be activated.

7.2.12 Notify the designated representative immediately of any OSHA recordable injury or illness to contractor employees or subcontractor employees occurring while on the site of this company. Provide a copy of each accident report to the designated representative.

7.2.13 Receive and use a copy of the facilities written safety policies and procedures.

7.3 After conclusion of the contract work, the contractor is responsible for cleaning all work areas and disposing of any discarded materials in a proper and legal manner.

8. Recordkeeping Requirements.

8.1 Company Requirements. The designated representative will:

8.1.1 Have a copy of the contract on file and be thoroughly familiar with its contents, and with the safety and health aspects of the work.

8.1.2 Keep records of all training done with company workers regarding

hazards to be caused by the contracting company.

8.1.3 Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.

8.1.4 Keep an OSHA recordable injury and illness log for the project, as well as copies of accident reports on all accidents that occur in the course of the project.

8.1.5 Keep a daily log regarding pre-work start-up inspection findings.

8.1.6 Keep records of all documentation of any sort given to you by the contractor, including records of training done, MSDSs, accident reports, etc.

8.1.7 Keep records of all documentation of any report you give to the contractor, including list of hazards to train their employees on, MSDSs, etc.

8.1.8 Document all discussions, letters, memos, or other communications made to the contractor regarding safety issues, including place, time, and names of people involved.

8.1.9 M&M ERECTORS requires that all contractors turn in weekly; Man-Hours worked and signed documentation of safety talks given on the job weekly.

8.2 Contractor Requirements. The contractor will:

8.2.1 Keep records of all training done with contract workers and all documentation provided to the contracting company regarding such training.

8.2.2 Keep copies on file of all forms or statements related to the contract that are required by the company to be filled out before or during contract work.

8.2.3 Have on file the telephone numbers of the nearest hospital, ambulance service, and fire department.

8.2.4 Have copies on-site of all material safety data sheets or other required information about chemicals relevant to the work on-site.

8.2.5 Keep an OSHA recordable injury and illness log, as well as copies of accident reports on all accidents that occur on the project.

Safety Program Responsibilities

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when operational changes occur that require a revision of this document.

2. Company Owner Responsibilities.

The Owners M&M ERECTORS recognizes the importance of safety and have committed to creating a place of employment, which is free from recognized hazards. The Owners are ultimately responsible for the safety of all employees of M&M ERECTORS They will ensure that all levels of management in the company are delegated the necessary authority to cultivate a safe environment and to take the appropriate actions to correct any deviations or deficiencies relating to safety on the job. They will also be responsible for making available the funds necessary to support the Safety Manager, which will ensure that employees are provided with effective safety equipment to perform their work.

3. Safety Manager Responsibilities.

The company Safety Manager will be responsible for the day-to-day management of the company safety program. The Safety Manager will assist the company in remaining in compliance with all applicable health and safety regulations. He will keep informed of current regulations and changes to those regulations that apply to the M&M ERECTORS In addition, he will supervise the enforcement of safety policies and procedures by supervisors and employees. The Safety Manager will identify, coordinate, and conduct training sessions to ensure that all employees are equipped with the needed safety skills and knowledge. The Safety Manager will perform inspections of jobsites and facilities and take the appropriate actions to correct any deviations or deficiencies relating to safety on the job. He will serve as a resource for Supervisors to assist them in daily enforcement of the safety program. The Safety Manager will monitor, review, and serve as a liaison for the safety of subcontractors to avoid placing this company or it's employees at risk.

4. Project Manager Responsibilities.

Project Managers will be responsible for safety on their respective projects. They will be expected to involve the Safety Manager at the beginning of every project even before work has started. Project Managers will take recommendations from and work with the Safety Manager to ensure the safety of employees on the job. Project Managers will also monitor the safety of subcontractors to avoid placing this company or it's employees at risk.

5. Supervisor Responsibilities.

Company Supervisors are responsible for the daily enforcement of the policies and procedures in the M&M ERECTORS safety program. They will be responsible for all aspects of employee safety in their respective areas. Supervisors will take recommendations from and work with the Safety Manager to provide a safe jobsite for all employees. They will conduct periodic safety meetings for their employees. Supervisors will monitor the safety of employees on a daily basis and take the appropriate actions to correct any deviations or deficiencies relating to safety on the job. Supervisors will be attentive to employee safety concerns and report them to the Safety Manager. They will keep in communication with the Safety Manager to ensure all employees receive training, refresher training, or retraining as needed. Supervisors will monitor the safety of subcontractors to avoid placing this company or it's employees at risk.

6. Employee Responsibilities.

Employees are the first lines of defense as it pertains to safety at all M&M ERECTORS jobsites. Employees are expected to abide by all of the safety policies and procedures in the company safety program. They will be held responsible for their own safety and are expected to report unsafe conditions to their Supervisors immediately. If the Supervisor is unavailable, they will report safety violations or concerns to the Safety Manager. Employees, if feasible, are also expected to correct safety violations within their immediate area. They will ensure they report to work in a state of readiness, with the appropriate clothing, and with all issued personal protective equipment. Employees will only operate equipment on which they have been trained and authorized to use. They will report accidents, injuries, and near misses immediately to their Supervisor.

SUBJECT: Accident Prevention and Investigation Program

REGULATORY STANDARD: OSHA - 29 CFR 1904

GENERAL: This Program is intended to address the issues of evaluating the hazards which have lead or potentially would lead up to an accident, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received awareness training before assignment.

Contents of the Accident Prevention and Investigation Program

Accident Prevention and Investigation Program

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when operational changes occur that require a revision of this document.

2. Training Requirements.

The purpose of accident investigation training and education is to ensure that members of the accident investigation team and all of our employees are sufficiently informed about the accident investigation program.

2.1 Employees will be adequately trained about the M&M ERECTORS accident investigation program. Proper training will allow managers, supervisors, and employees to understand the procedures to follow to report an accident, hazards associated with a job or production process, their prevention and control, and their medical consequences.

2.2 Training for affected employees will consist of both general and specific job training:

2.2.1 General Training. Employees will be given formal instruction on the hazards associated with their jobs and with their equipment. This will include information on the varieties of hazards associated with the job, what risk factors cause or contribute to them, how to recognize and report hazardous conditions, and how to prevent accident with their respective jobs. This instruction will be repeated for each employee as necessary. This training will be conducted on an annual basis.

2.2.2 Job-Specific Training. All employees will be trained in specific procedures associated with their jobs based on current JSA's and other specific procedures contained in the M&M ERECTORS safety program.

2.3 Training for Supervisors. Supervisors are responsible for ensuring that employees follow safe work practices and receive appropriate training to enable them to do this. Supervisors therefore will undergo training comparable to that of the employees, and such additional training as will enable them to recognize hazardous work practices, to correct such practices, accident reporting/investigation requirements, and to reinforce the M&M ERECTORS safety program.

3. Accident Prevention.

Preventing accidents is the purpose of the M&M ERECTORS Safety Program. Preventing future workplace injuries in our company is the principle purpose of accident investigations. This document will provide a basis for studying and recording the reasons an accident occurred, identifying existing or potential job hazards (both safety and health), and determining the best course of action to take to reduce or eliminate these hazards.

3.1 Employee Responsibilities. Employees are expected to abide by all of the safety policies and procedures in the company safety program. They will be held responsible for their own safety and are expected to report unsafe conditions to their Supervisors immediately. If the Supervisor is unavailable they will report safety violations or concerns to the Safety Manager. Employees, if feasible, are expected to correct safety violations within their immediate area. They will ensure they report to work in a state of readiness, with the appropriate clothing, and with all issued personal protective equipment. Employees will only operate equipment on which they have been trained and authorized to use. They will report accidents, injuries, and near misses immediately to their Supervisor.

3.2 Supervisor Responsibilities. Company Supervisors are responsible for the daily enforcement of the policies and procedures in the M&M ERECTORS safety program. Supervisors will monitor the safety of employees on a daily basis and take the appropriate actions to correct any deviations or deficiencies relating to safety on the job. Supervisors will be attentive to employee safety concerns and report them to the Safety Manager. Supervisors will assist the Safety Manager in conducting accident investigations or conduct the investigation under his supervision. Supervisors will use the Hazard Report (See Appendix to this program) to document and report any hazards, which cannot be immediately eliminated.

4. Hazard Reporting.

The M&M ERECTORS Hazard Report will be used by all employees to report potential or known hazards. The following procedures apply:

4.1 Person reporting hazard:

4.1.1 Notify supervisor of the hazard.

4.1.2 Fill out required sections of the hazard report, if applicable.

4.2 Supervisor:

4.2.1 Notify all affected workers of hazard.

4.2.2 Notify subcontractor of hazard, if applicable.

4.2.3 Ensure hazard is properly marked and controlled.

4.2.4 Fill out required sections of the hazard report.

4.2.5 Forward report immediately to the Safety Manager.

5. Accident Investigation.

Accident investigation is primarily a fact-finding procedure; the facts revealed are used to prevent reoccurrences of similar accidents. The focus of accident investigation will be to prevent future accidents and injuries to increase the safety and health of all our employees.

5.1 Immediate concerns.

5.1.1 Ensure any injured person receives proper care.

5.1.2 Ensure co-workers and personnel working with similar equipment or in similar jobs are aware of the situation. This is to ensure that procedural problems or defects in certain models of equipment do not exist.

5.1.3 Start the investigation promptly.

5.2 Accident investigation report. The M&M ERECTORS investigation report or similar form which details specific company requirements for investigation will be used to gather data to determine causes and corrective actions. As a minimum the form will contain the following areas of concern.

5.2.1 Accident investigation form data. (See Appendix to this program)

- Injured employee's name
- Date and time of injury
- Occupation or task being performed when injured
- Shift and department
- Company ID number
- Employee's address
- Sex/age/DOB
- Social security number
- Length of service
- Length of time at specific job
- Time shift started
- Overtime length when injury occurred
- Physician's and hospital name (if transported)
- Type of injury
- Resulting fatalities
- Description and analysis of accident
- Complete accident tree
- Action taken to prevent recurrence and person
- Employee's statement
- Witnesses' statement
- Employer's statement
- Person completing form and date
- Person(s) reviewing form and date

5.3 Reviewers. All accident investigation reports will be reviewed by the Safety Manager and Project Manager involved to ensure pertinent information is

transmitted to all concerned and that remedial action(s) are taken.

5.4 Accident investigation final report. The final report will be numbered in the upper right hand corner, Page of Pages. The report will include but is not limited to the following.

5.4.1 Investigation report form and pertinent data

5.4.2 Photographs/drawings/exhibits of scene

5.4.3 Narrative of accident

5.4.4 Contributing information

5.4.5 Findings and recommendations of review team

5.4.6 Action items and completion dates

5.4.7 Responsible persons

6. Sequence of Steps.

6.1 Once the injured employees have been treated and cared for, Supervisors must ensure that they, the Safety Manager, or other designated individual accompany the injured employee to the hospital or health care provider.

6.2 Supervisors will ensure that the area where the accident occurred is secured to avoid further injuries and allow opportunity for investigation.

6.3 Photographs of the site should be taken from different angles.

6.4 The employee involved in the accident and any witnesses in separate interviews will be asked to explain in their own words what happened. The witness statement will be read back to them and they must sign it. It is important to document what the employee says and not influence them in any way.

6.5 The Accident Report form must be filled out completely. Ensure the directions for filling out the forms are followed. Supervisors must submit completed forms to the Safety Manager for review.

6.6 Ensure that immediate hazards have been addressed and proceed with any follow-up actions identified in the Accident Report.

SUBJECT: OSHA Inspection Procedures

REGULATORY STANDARDS: OSHA 29 CFR 1926.3
OSHA 29 CFR 1926.4

GENERAL: The purpose of this plan is to describe the specific actions required of M&M ERECTORS employees and Subcontractor employees upon the arrival of a Compliance Officer at M&M ERECTORS workplace or jobsite to inspect facilities or equipment or to investigate matters related thereof. It is the responsibility of the Department of Labor, Division of Occupational Safety and Health Administration to carry out the compliance in the State of Texas for Occupational Safety and Health. In this regard, Federal OSHA Compliance Safety and Health Officers carry out the enforcement and monitoring aspects of the Act. The OSH Act is applicable to all Contractor organizations (including Sub Contractor activities/operations).

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of the company. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury.

Contents of the OSHA Inspection Procedures

OSHA INSPECTION PROCEDURES

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations, when operational changes occur that require a revision of this document, when there is an accident or near miss that relates to this area of safety, or any time fall protection procedures fail.

2. Training Requirements.

M&M ERECTORS will provide training to all supervisors ensure that they understand the importance and the necessary procedures which must be taken in the event of an OSHA inspection. Training will be conducted by the Safety Manager or other designated competent personnel. The training will include the information contained in this procedure and other applicable information as deemed necessary by the Safety Manager.

3. Receiving the Compliance Officer.

Upon arrival of the Compliance Officer, the Safety Coordinator shall greet the individual and verify the Compliance Officer's credentials. All personnel are expected to be courteous and professional during any OSHA inspection.

3.1 Sub contractor's representative(s) should participate in the inspection process. The Contractor may request time for their Safety Coordinator and/or Insurance Administrator Safety Representative to get to the job site. Ask if the inspection can take place at a time when the company representative can be there.

4. Opening Conference.

An opening conference will be conducted by the Compliance Officer. It will normally be held at the job site and must include representatives of all companies affected by the Compliance Officer's visit.

4.1 The Compliance Officer will usually cover the following topics during the opening conference:

- 4.1.1 Nature and Purpose of Visit - Focused inspection, employee complaint, etc.
- 4.1.2 Scope of Inspection - Areas to be inspected, employee interviews, etc.
- 4.1.3 Equipment to be Used – Camera, Sound level meter, Air monitor, etc.
- 4.1.4 Records to be Reviewed.

4.2 Invitation to Participate in the Inspection - Contractor and Subcontractor personnel.

4.2.1 Distribution of OSHA Materials - Copies of the Act, Standards, promotional materials, etc.

5. Walk Around Inspection.

The inspection shall be conducted within reasonable limits and in a reasonable manner during regular working hours except when mutually agreed upon by parties concerned.

5.1 The Compliance Officer shall comply with all the safety and health rules during the inspection, including the wearing of required personal protective equipment.

5.2 During the course of the inspection, the Compliance Officer may:

5.2.1 Agree to the participation of more than one employer representative and one employee representative in the walk around;

5.2.2 Interview, question, or invite comments from a reasonable number of employees. If consultation unduly hinders work activity, he/she may arrange for off-duty interviews at a location other than the workplace. Written statements may be taken under certain conditions;

5.2.3 Receive complaints from employees regarding possible violation(s) of the standards, provided there is no interference with the inspection.

5.3 The Compliance Officer shall be permitted to take photographs.

5.4 During the course of the inspection, the M&M ERECTORS and subcontractor designated job site representative(s) will:

5.4.1 Accompany the Compliance Officer at all times during the inspection;

5.4.2 Take detailed notes of inspection activities (comments, samples/tests taken, records given/reviewed, location of photos taken, etc.);

5.4.3 Photograph anything that the Compliance Officer photographs (if a camera is available);

5.4.4 If requested, ensure that the Compliance Officer is permitted interviews with job site employees. Employees do not have to allow themselves to be interviewed, and may insist that interviews

be accompanied by other person(s).

5.5 At the conclusion of the walk around, the Compliance Officer will ensure that employee representatives are informed of the apparent violations(s), if any, found during the inspection. Make careful notes about Compliance Officer's questions concerning training and understanding by employees.

6. Closing Conference.

At completion of the inspection, a closing conference will be arranged to permit the Compliance Officer to advise both Contractor and/or any Sub Contractor representatives of any alleged violation(s) observed during the inspection. The Compliance Officer should indicate the applicable section(s) of the standards which are alleged to have been violated and provide the following:

6.1 Alleged violation(s), which may be the basis of a citation;

6.2 Methods used to establish abatement period(s);

6.3 Penalty determination procedures;

6.4 Appeal and contest procedures;

6.5 Abatement details and follow-up inspection;

6.6 Variance procedures;

6.7 Availability of an informal conference with the area director;

6.8 Distribution of OSHA material (if not done at the opening conference).

NOTE: As with the opening conference and walk-around inspection, detailed notes shall be taken by the Safety Manager.

7. Follow-up Actions.

After (if not during) the inspection process has been completed and the Compliance Officer has left the site, the Contractor will immediately correct any violations, which can be abated "on-the-spot."

7.1 The Contractor shall direct any cited Sub Contractor to correct/abate those violations for which the Sub Contractor has control and which might expose employees to injury or illness.

SUBJECT: Emergency Action Plan

REGULATORY STANDARD: OSHA - 29 CFR 1910.38, 1926

GENERAL: This plan is intended to address the issue of providing for the orderly evacuation of the a jobsite during emergency situations. The main goal of any evacuation is the rapid, systematic removal of all persons from potentially hazardous areas, to a safe muster point, to account for all employees, and to assure an all-clear of the evacuated area.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received awareness training before assignment to work.

Contents of the Emergency Action Plan

Emergency Action Plan

1. Written Plan.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulation, appears to be out of place, or when operational changes occur that require a revision of this document.

2. Evacuation Notification.

2.1 Evacuation notification may be received in the form of alarms, sirens, strobe lights or verbal notifications depending on the location of the work. It is extremely important that Supervisors brief their employees on the type of evacuation notification they may receive at the beginning of every job.

2.2 Employees must remain attentive to all evacuation orders as they may include specific information such as:

- 2.3.1 The reason for the evacuation.
- 2.3.2 The area or areas involved in the evacuation.
- 2.3.3 Any area or areas to be avoided in the evacuation.
- 2.3.4 Any muster points that must be avoided.

3. Employee Responsibility.

3.1 All employees upon receipt of an evacuation order shall exit the work area via the Nearest Unaffected Exit. They shall proceed to the designated muster point for the area they were in at the time of the evacuation order, quickly and quietly. They shall also upon request, aid their supervisor in taking role or by being a runner.

3.2 Egress Routes. All employees shall become familiar with the location of all posted egress routes of the facility areas that they frequent use and shall know the primary and secondary egress routes of their work area.

3.3 Muster Points. All employees shall become familiar with the marked muster points and shall know the primary muster point of the facility areas that they frequently work in. **NO ONE WILL LEAVE A MUSTER POINT WITHOUT THE EXPRESS PERMISSION OF THE SUPERVISOR PRESENT.**

3.4 Severe Weather Safe Spots. All employees shall become familiar with posted Severe Weather Safe Spots, and shall know the location of the nearest Severe Weather Safe Spot for the areas that they frequently work in. Upon the announcement of a “take-cover” order proceed to the designated safe spot.

3.5 Arrival Actions. Upon arrival at an muster point, each employee shall seek

out the Supervisor present to assure that they have been accounted for. They shall also upon request, aid area supervisors or managers in taking a role.

3.6 Visitor Escorts. Each visitor at the facility must be escorted at all times throughout the facility by a company employee. The escort will ensure their visitor is escorted to an muster point or safe spot as required. Upon arrival at a muster point, the visitor's name will be forwarded to the employee in charge at the muster point.

4. Supervisor Responsibility.

4.1 If time permits, supervisors shall determine what machines or processes should be shut down. Hazardous process shut-downs will be done in accordance with established procedures.

4.2 Supervisors shall assist employees in making a quick egress of the area and direct them to the assigned muster point.

4.3 Supervisors shall take role to assure all their employees are accounted for and shall submit a list of any employees missing and/or additional persons located at their muster point to senior management and or the responding fire department.

5. Visitor Responsibility.

5.1 Company Escorts. The evacuation of a visitor is the responsibility of the company escort. All visitors will be briefed that they must be escorted at all times in the facility by a company employee.

5.2 Muster Points. All visitors shall be briefed prior to entering, on the safety rules and regulations at the facility. Upon notification of an evacuation the escort will ensure that they immediately exit the building or jobsite via the nearest exit, report to the nearest muster point, and give their name to the Supervisor in that muster area. **NO ONE WILL LEAVE MUSTER POINTS WITHOUT THE EXPRESS PERMISSION OF THE SUPERVISOR IN CHARGE.**

5.3 Severe Weather Safe Spots. Visitors shall be escorted to the nearest Severe Weather Safe Spot upon notification to take-cover and give their name to the Supervisor present in the Safe Spot.

6. Contractor Responsibility.

6.1 The evacuation of an employee of a contractor is the responsibility of that

contractor.

6.2 Muster Points. All contractor employees shall be briefed by the contractor's management before entering the site, as part of any required OSHA training. Upon notification of an evacuation they will immediately exit the building or jobsite via the nearest exit and report to the nearest muster point and give their name to the Supervisor present. **NO ONE WILL LEAVE MUSTER POINTS WITHOUT THE EXPRESS PERMISSION OF THE SUPERVISOR IN CHARGE.**

6.3 Severe Weather Safe Spots. All contractor employees shall be briefed by the contractor's management before entering the site, as part of any required OSHA training, the location of severe weather safe spots in the event of an emergency. Upon notification to take-cover they will proceed to the nearest severe weather safe spot and give their name to the Supervisor present.

6.4 Temporary Work Structures. The evacuation of a temporary structure brought onto company property will be the responsibility of the contractor. Once evacuated, all personnel shall report to the nearest muster point and give their name to the Supervisor present.

7. Procedures For Fire & Explosions.

7.1 Upon notification of a fire or explosion all employees should evacuate the building or jobsite immediately in accordance with the posted evacuation routes and report to the assigned (or) nearest muster point or location designated at the time.

7.2 Supervisor Responsibilities. Supervisors will provide guidance and instructions as needed. Evacuation should be done in a calm and orderly manner. **NO ONE WILL LEAVE MUSTER POINTS WITHOUT THE EXPRESS PERMISSION OF THE SUPERVISOR IN CHARGE**.

7.3 Employee Responsibilities. Once you leave the building or jobsite, NEVER RE-ENTER until instructed to do so by management!

7.4 Difficulties in Evacuation. If smoke and/or heat conditions are encountered while evacuating, remember to stay low to the floor and exit by the nearest door or window. In the event of a major fire, evacuation may have to be delayed until the fire is actually put under control and/or extinguished. If this situation exists, remain calm and shield yourself from the fire. If you are unable to escape, stuff clothing, rags, etc., in or around all cracks to help keep the smoke from entering your location. It is most important to try and notify someone of your location. If the telephone is out of service, try to get someone's attention by yelling or making noises. ABOVE ALL, remain calm until help arrives.

8. Procedures For Severe Weather.

8.1 Upon notification of impending severe weather, i.e., a Tornado Warning or severe Thunder Storm Warning, and where immediate danger poses a threat to the building or jobsite, employees must report to a designated muster point in the building or at the jobsite.

8.2 Where no muster point has been designated or if you are unable to get to the severe wheather muster point locate a point inside the building away from chemicals, furnaces, piping, and windows or a low point outside of the immediate area.

8.3 Remain in the area until an all clear announcement has been made.

9. Procedures To Return To Work.

9.1 Evacuation. After a survey of the facility has been conducted by emergency responders, and/or personnel designated by management, the decision for return to work will be made. If the area is declared hazard free personnel may return to work once the order is given. If hazards are detected personnel will be released to go home. **ALL PERSONNEL WILL REMAIN ON AT THE JOBSITE, UNLESS OTHERWISE DIRECTED BY MANAGEMENT.**

9.2 Severe Weather. After the take-cover order, all personnel shall proceed to their safe spot and remain there until the all-clear announcement is made.

SITE SPECIFIC SAFETY & EMERGENCY RESPONSE PLAN

FOR

PROJECT NAME

CUSTOMER NAME

PHYSICAL ADDRESS

EMERGENCY CONTACT INFORMATION

Unless otherwise directed by contract all COMPANY NAME employees and its subs will follow this procedure for medical and emergency response and reporting.

It is imperative that the Safety Department be contacted immediately (24/7) in the event of; an accident / injury, vehicle accident, any incident involving damage to company, customer or the general public property and/or equipment, visits by OHSA or other regulatory agencies, theft or altercations.

Safety Department PHONE
(See List of Contacts Below in Sec. 2.4)

MEDICAL CONTACTS

Primary Physician

Emergency Room

Fire, EMS, Police

If customer supplied service

Site First Aid Attendant

1. INTRODUCTION

1.1 Site Specific HSE Policy and Objectives

Company Name is committed to completing the project with zero (0) accidents or injuries. In order to achieve this goal, the safety and health of all personnel, whether they are employees, subcontractors or members of the general public, must receive primary consideration in all phases of the project, including planning, scheduling and execution of the work.

Compliance with company requirements and federal and local safety regulations is mandatory. Employees, Visitors, and Subcontractors will be required to comply with these requirements as a minimum. Exceptions to any of the above for reasons of economic considerations or previous practice will not be considered. Where differences in policy occur between Company Name and a customer the more stringent requirement will apply.

2.0 PROJECT SCOPE

2.1 Description of Work-

2.2 Schedule-

2.3 Working Environment-

2.4 HS&E and Key Contacts / Coverage

Company Name will supply a Safety Representative from its company to perform periodic safety audits to ensure regulatory compliance throughout the duration of the project.

Company/Title	Name	Office #	Cell No./Pager
Office Manager			
Project Manager			
Safety Representative			
Site Foreman			
Back up Foreman			

3.0 Project Work Scope

3.1 General Work Scope

3.2 Project Specific Procedures

3.2.1 Project Safety Plan

All employees will comply with the requirements of the Project Safety Plan as a minimum. The plan incorporates company and customers policies and procedures, as well as, regulatory requirements that relate to the work scope contained herein.

3.2.2 Site Specific Procedures Developed

3.2.3 Lock Out/ Tag Out

3.2.4 Confined Space

3.2.5 Trenching and Excavation

4.0 CONTRACTORS AND SUPPLIERS

4.1 Selection of Contractors and Suppliers-

4.2 Subcontractors to be Used-

4.3 Subcontractors Scope of Work-

4.4 Training and Certification

4.4.1 Training and Certifications

4.4.2 Orientation

4.4.3 Equipment/Tools

4.4.4 Site Specific Training

5.0 Safety, Health and Environmental Programs

The following requirements apply to Company Name Personnel and Subcontractors. These are not all of the safety requirements for this project, but an overview. Other safety requirements can be found in the Company Name Safety, Health and Environmental Manual, and contract agreements. Where customer policy and procedure requirements are defined the more stringent, will prevail.

- Site Visitor Safety Orientation - All employees visiting the facility must have completed, at a minimum, the Site Specific Visitor/contractor Orientation (where required), prior to being allowed onto the site. Visitors will be defined as anyone that is not assigned on-site and who does not perform work. A company/customer representative must escort visitors without required training at all times. An example of a site visitor is: managerial/consulting type person, delivery personnel, vendors, suppliers, office temporaries, etc.

- Company Vehicles - The vehicle operator must have a valid driver's license to include a Commercial Drivers License (CDL) with appropriate endorsements when applicable. Vehicles must be current on annual inspections and must be maintained in a safe operating condition. Any vehicle observed to be non-compliant shall not be operated.

- Vehicle Safety – Seatbelts must be worn while operating vehicles and mobile equipment. The number of passengers riding inside a vehicle will be limited to the number of seatbelts available. Individuals will not ride in the bed of trucks unless the bed is empty and the tail gate is closed. Riders should be limited to six individuals.

- Unattended Vehicles – No vehicle shall be left unattended with the motor operating. 'Unattended' is defined as no operator physically in the driver's seat of the vehicle in a position to control it.

- Pedestrian Traffic - Pedestrians shall have the right of way over vehicles and bicycles. All traffic must yield to pedestrians. All pedestrians shall walk on sidewalks whenever possible, or near the left side of roadways facing oncoming traffic unless designated walkways have been established.

- Equipment Safety – No One shall be allowed to operate motorized equipment unless they are trained and authorized to do so.

- Electrical Safety – Ground Fault Circuit Interrupters (GFCI) will be required when using portable electric tools, lights, extension cords, or other portable electrical equipment.

- Scaffolding- The Company's designated competent person will be on site during operation. The scaffolding shall be inspected and tagged by the competent person prior to start of each shift, prior to use when a scaffold has been erected. The company shall also provide documentation of scaffold safety training for the scaffold erection & dismantle crew and for all scaffold users.

- Fall Protection – All elevated work above 6' will require 100% fall protection this includes work performed on scaffolds. Engineered systems to alleviate fall potential shall be the preferred method. In the event engineered systems can not be installed, the following control methods shall be implemented:

    1. Full body harness
    2. Shock absorbing lanyards (2 per employee)
    3. Double locking snap hooks on lanyards
    4. Deceleration Device (as required)
    5. Employee training
    6. Supervisors and employees will identify adequate anchorage points prior to working at elevation.

- Personal Protective Equipment (PPE) – The following minimum PPE is required while working at any COMPANY NAME Job Location: Hard hat (ANSI Z-89 approved) (with chemical goggles attached; optional), safety glasses (ANSI Z-87 approved), Work Boots (ANSI approved Z-41) and Flame Retardant Clothing (FRC) as required by the site. Other PPE must be made available, such as double eye protection, double hearing

protection, respiratory protection, hand protection, and safety harness with two double locking lanyards and a deceleration device for fall arrest equipment. Long hair extending beyond the top of the shoulders must be tied back and tucked inside the shirt collar or under the hardhat.

- Note: Also, as condition of employment, employees that must wear prescription glasses are required to provide proof that their glasses meet the ANSI Z-87 guidelines. Shaded glasses shall not be worn at night, indoors or in poorly lighted areas.

- Excavation – All employees shall follow the site-specific excavation procedures established by the customer. Verification of all underground utilities and material will be the initial priority before beginning any excavation activities. Unless otherwise determined all soil classification will be considered Class "C" Soil. If personnel cannot verify locations of underground utilities then it's the Job Site Supervisor's responsibility for locating such underground utilities using approved probing (locating) methods. An "Excavation Checklist" must be completed by the Designated Competent Person and posted at the excavation site prior to any employees entering the excavation as well as obtaining required any customers Excavation Permit. A "Confined Space Permit" must be obtained for excavations 4' or greater in depth. Soil to be excavated will be evaluated to determine if hazardous materials are present. If soil is contaminated, special removal and handling procedures shall be followed. Only trained and authorized employees can work near soil that has been classified as hazardous material.

- Employee Identification - All contractors must visibly wear their identification badge if required. Also, Hardhats must bear the company logo. Hard hats will not be altered or painted in any way. Unless, customer directed, white hardhats will be worn by all employees. Red will indicate Safety personnel.

- Job Safety Checklist (JSC) – A JSC outlining a safe plan of action shall be developed and documented prior to beginning each assigned task. This JSC shall identify potential hazards associated with the task.

- Job Safety Audits– For projects longer than a week Job Safety Audits must be preformed by the Site Supervisor Weekly. Site audits will be conducted by the Safety Department on a random basis. It is the responsibility of the Site Supervisor to ensure corrective measures are taken on all deficiencies noted.

- Sanitary Facilities – COMPANY NAME will ensure the proper number of appropriate and adequate sanitary facilities are available to craft employees per OSHA 29CFR1926.

- Drinking Water – Drinking water will be provided by COMPANY NAME in approved water receptacles. COMPANY NAME employees shall only drink from those water receptacles that have been designated for use. Water containers are to be cleaned and sanitized daily. After being refilled, the lids shall be taped shut and dated.

- Work/Permits – Specific work permits are required for certain types of construction activities such as Cold Work, Hot Work, Confined Space Entry and Electrical Lock-Out/Tag-Out. All permits (as they are identified) must be obtained from the customer Operations or Other designee personnel prior to beginning the aforementioned activities.

- Fire Prevention – COMPANY NAME has a goal of zero fires. All fires regardless of size are taken seriously and must be reported. Job planning shall include measures to prevent fires. The location and control of combustibles must be factored into this planning process. Combustibles or Flammables are not allowed in or near spark or flame producing activities Gloves, rags, coats, shirts, or other combustibles shall not be placed on or near hot surfaces. Housekeeping must be maintained so that trash is not allowed accumulate or blow around. 100% spark containment is required for welding/burning/sparking activities within the process area. Any combustibles must be at least 35 feet from all welding, burning, or sparking operations. Combustibles that cannot be moved must be covered.

The Safety Execution Plan (SEP) identifies hazards associated with jobs within the work scope. The SEP then outlines associated steps that will be taken to mitigate or eliminate these hazards.

Task	Associated Hazards	Steps to Eliminate Hazards

SITE SPECIFIC SAFETY & EMERGENCY RESPONSE PLAN

FOR

PROJECT NAME

CUSTOMER NAME

Completed by:

Signature	Title	Date
Signature	Title	Date
Signature	Title	Date

Approved by:

Signature	Title	Date
Signature	Title	Date

This document must be complete and signed by the Project Management Team before the project is started.

This document is to be copied and the original sent to the Safety Department. A copy of the plan is to be posted in the project office where it can be viewed by all persons on the job site.

If the job scope changes, additional entries or supplements of the plan must be submitted for approval before changes are initiated.

SUBJECT: Housekeeping Program

REGULATORY STANDARD: OSHA 29 CFR 1926.25
OSHA 29 CFR 1926.151

GENERAL: This plan is intended to address the issue of providing for maintaining an orderly, clean, and safe work environment at all times in all areas. Good housekeeping is a necessary requirement for maintaining safety at job sites. It is proven that clean and tidy work sites hold fewer hazards for all employees.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORSowners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and maintain their work areas in an orderly fashion throughout the day.

Contents of the Housekeeping Program

HOUSEKEEPING PROGRAM

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations, when operational changes occur that require a revision of this document, or when there is an accident or near miss that relates to this area of safety. This document serves as the written procedures for general housekeeping at M&M ERECTORS. These guidelines provide housekeeping standards in this facility to help ensure a safe work environment at all times in all areas.

2. Training Requirements.

2.1 All of our employees, including contractor employees, need to understand the safety and health hazards of poor housekeeping and improper chemical storage to protect themselves, their fellow employees, and the citizens of nearby communities. While training in Hazard Communication will help employees to be more knowledgeable about the chemicals they work with as well as familiarize them with reading and understanding MSDSs, we will also train them in our our Housekeeping Program, covering housekeeping procedures, safe work practices, hazard reporting, and other areas pertinent to housekeeping.

2.2 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training.

2.3 Retraining. The training content will be identical to initial training. Refresher training will be conducted on an annual basis or when the following conditions are met, whichever event occurs sooner.

2.3.1 Retraining will be provided for all authorized and affected employees whenever (and prior to) a change in their job assignments, a change in the type of fall protection equipment used, or when a known hazard is added to the work environment which affects the fall protection program.

3. Housekeeping.

Good housekeeping is a necessary requirement for maintaining safety at construction sites, clean and tidy work sites hold fewer hazards for all employees, Accidents and injuries are avoided and productivity improved where good housekeeping is a daily occurrence,

3.1 Good housekeeping is possibly the most visible evidence of management and employee concern for safety and health that a company displays on a day-to-day basis, Orderliness in our workplace contributes to a safe working

environment by minimizing obstacles and potential safety and health threats such as spills, trip hazards, etc. In fact, we have nine good reasons for housekeeping:

3.1.1 Prevents accidents

3.1.2 Prevents fire

3.1.3 Saves time

3.1.4 Gives control to our workers

3.1.5 Gives our workers the freedom to move

3.1.6 Gives our workers pride

3.1.7 Protects our products and equipment

3.1.8 Reduces our waste

4. Hazard Assessment.

Supervisors are responsible for identifying main housekeeping issues. Supervisors will look for a lack of order, unremoved spills or obstructions, or other hazards due to poor organization or poor housekeeping.

5. Housekeeping Procedures

It is the intent of this company to standardize housekeeping measures, meet OSHA requirements, and encourage safety. The procedures listed below cover many of the common jobsites we will have.

5.1 All tools and equipment must be kept in good working condition. Hand tools, portable electric tools, extention cords and similar equipment should be kept in tool boxes or other designated locations when not in use.

5.2 Aisles, Walkways, and Floors must be kept clear to allow for easy access to fire extinguishers, electrical disconnects, safety showers, and other emergency aids.

5.3 Electrical panels must be kept clear for an area of 36 inches in front.

5.4 Walkways not for pedestrian traffic must be clearly marked.

5.5 Keep aisles and walkways free of physical obstructions that would prevent access, including path-blocking objects, liquid or solid spills, and other obstructions.

5.6 Keep stairs clean, dry, and free of waste, well-lit, and provided with adequate hand rails and treads that are in good condition.

5.7 Keep floors clean; dry (dry as possible); slip-resistant; and free of waste,

unnecessary material, oil and grease, protruding nails, splinters, holes, or loose boards.

5.8 An adequate number of waste receptacles at accessible locations throughout all work areas must be provided.

5.9 All areas must be cleaned of scrap and tools before leaving for breaks, lunches, or to go home at the end of the day.

5.10 Office Areas, reception areas, meeting rooms, and/or personal office spaces as part of our office space must be clean throughout the workday

5.11 Keep doors and windows properly maintained in good working order. Repair any damage to doors and windows at regular intervals.

SUBJECT: Workplace Back Safety Program.

REGULATORY STANDARD: OSHA - 29 CFR 1926.20 - .21

GENERAL: M&M ERECTORS will ensure that potential back injury risk factors at our jobsites are evaluated and controlled. This program is intended to address the issues of evaluating and identifying back injury hazards, evaluating engineering controls, work practices, administrative controls, and establishing appropriate procedures.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received training before assignment to work.

Contents Workplace Back Safety Program

WORKPLACE BACK SAFETY PROGRAM

1. Written program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations, or when operational changes occur that require a revision of this workplace back safety program.

2. Training Requirements.

2.1 Types of training. Supervisors will determine whether training required for specific jobs will be conducted in a classroom or on-the-job. The degree of training provided will be determined by the complexity of the job and the associated hazards.

2.1.1 Initial Training. All employees will receive awareness training that will describe the basic hazards of lifting and common lifting techniques. Prior to job assignment, M&M ERECTORS will provide training to ensure that the hazards associated with predestinated job skills are understood by employees and that the knowledge and skills required for the safe application and usage of work place procedures and equipment, are acquired by employees. The training will include the following:

2.1.2 Each affected employee will receive training in the recognition of back injury hazards involved with a particular job, and the methods and means necessary for safe work.

2.1.3 Training course content. All new and current workers, who work in areas where there is reasonable likelihood of back injury, will be kept informed through continuing education programs. Initial and refresher training will, as a minimum, cover the following:

2.1.3.1 Back hazards associated with the job.

2.1.3.2 Lifting techniques.

2.1.3.3 Potential health effects of back injury.

2.1.3.4 Back injury precautions.

2.1.3.5 Proper use of protective clothing and equipment.

2.1.3.6 Use of engineering controls.

2.2 Responsibility. Employees are responsible for following proper work practices and control procedures to help protect their health and provide for

the safety of themselves and fellow employees, including instructions to immediately report to the Supervisor any significant back injury.

2.3 Refresher Training. Scheduled refresher training will be conducted on annual basis.

2.3.1 Retraining will be provided for all affected employees whenever there is a change in their job assignments, a change in equipment or processes that present a new hazard, or when their work takes them into other hazard areas.

2.3.2 Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever M&M ERECTORS has reason to believe, that there are deviations from or inadequacies in the employee's knowledge of known hazards, or use of equipment or procedures.

2.3.3 The retraining will reestablish employee proficiency and introduce new equipment, new lifting procedures or revised control methods and procedures, as necessary.

2.1.3 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain a synopsis of the training conducted, each employee's name, and dates of training.

3. Hazard Prevention and Control.

3.1 Job Safety Analysis. Job safety analyses will be performed by Supervisors at the beginning of new jobs. Supervisors will be trained to look for potential back injury risks. This analysis will help to verify risk factors and to determine if risk factors for a work position have been reduced or eliminated to the extent feasible.

3.2 M&M ERECTORS understands that engineering solutions, where feasible, are the preferred method of control for lifting hazards. The focus of this program is to make the job fit the person, not to make the person fit the job. This is accomplished whenever possible by redesigning the work station, work methods, or tool(s) to reduce the demands of the job, including high force, repetitive motion, and awkward postures. The Safety Manager will, whenever possible, research into currently available controls and technology.

4. Administrative Controls.

Company administrative controls will be used to reduce the duration, frequency, and severity of exposures to lifting hazards, which can cause back injury. Examples of administrative controls include the following:

4.1 Reducing the amount of exposure per employee by such means as

decreasing production demand and limiting overtime work.

4.2 Providing rest pauses to relieve fatigued muscles. The length of time needed depends on the task.

4.3 Increasing the number of employees assigned to a task to alleviate severe conditions, especially in lifting heavy objects.

4.4 Using job rotation with caution and as a preventive measure. The principle of job rotation is to alleviate physical fatigue and stress of a particular set of muscles rotating employees among other jobs that use different muscles. Providing sufficient numbers of standby/relief personnel to compensate for foreseeable upset conditions on the line (e.g., loss of workers).

4.5 Job enlargement. Having employees perform broader functions which reduce the stress on specific muscle groups while performing individual tasks.

5. Safe Lifting Techniques.

First, use a pushcart or other material-handling device! Second, ask a co-worker for help if no device is available! If you must lift alone here are some tips. Before starting to lift or carry anything, check your entire walkway to make sure your footing will be solid. Your shoes should give you good balance, support and traction. Keep loads as close to your body as possible. The following situations show basic lifting techniques to avoid injury:

5.1 Lifting or lowering from a high place

- 5.1.1 Stand on a platform instead of a ladder
- 5.1.2 Lift the load in smaller pieces, if possible
- 5.1.3 Slide the load as close to yourself as possible before lifting
- 5.1.4 Grip firmly and slide it down
- 5.1.5 Get help when you need it to avoid injury

5.2 Lifting from hard-to-get-at places

- 5.2.1 Get as close to the load as possible
- 5.2.2 Keep back straight, stomach muscles tight
- 5.2.3 Push buttocks out behind you
- 5.2.4 Bend your knees
- 5.2.5 Use leg, stomach, and buttock muscles to lift -- not your back

5.3 Lifting drums, barrels, and cylinders

- 5.3.1 Use mechanical equipment
- 5.3.2 Be aware that loads can shift
- 5.3.3 Get help if load is too heavy

5.4 Awkward objects

- 5.4.1 Bend your knees with feet spread
- 5.4.2 Grip the top outside and bottom inside corners
- 5.4.3 Use your legs to lift, keeping back straight

5.5 Shoveling

- 5.5.1 Make sure your grip and balance are solid
- 5.5.2 Tighten your abdomen as you lift
- 5.5.3 Keep the shovel close to your body
- 5.5.4 Use the strength of your thigh muscles to bring you to an upright position
- 5.5.5 Increase your leverage by keeping your bottom hand low and toward the blade

5.6 General safety tips

- 5.6.1 Don’t lift objects over your head
- 5.6.2 Don’t twist your body when lifting or setting an object down
- 5.6.3 Don’t reach over an obstacle to lift a load
- 5.6.4 Pace yourself to avoid fatigue

SUBJECT: Bloodborne Pathogens Safety Program

REGULATORY STANDARDS: OSHA 29 CFR 1910.1030
OSHA 29 CFR 1926.21(b)(2), 1926.25

GENERAL: M&M ERECTORS will ensure that the hazards associated with exposures to blood or other potentially infectious materials are evaluated and that information concerning their hazards is transmitted to all employees. This Program is intended to address the issues of evaluating these potential hazards, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received the basic awareness training before their assignment to work.

Contents of the Bloodborne Pathogens Safety Program

BLOODBORNE PATHOGEN SAFETY PROGRAM

1. Written Program.

These guidelines provide safe practices to protect employees of M&M ERECTORS from the contraction of disease resulting from handling blood or other potentially infectious materials (OPIM) during the course of work. M&M ERECTORS will review and evaluate this program on an annual basis, when changes occur to the regulations, when operational changes occur that require a revision of this document, or when there is an accident or near miss that relates to this area of safety.

2. Training Requirements.

All employees of M&M ERECTORS will receive basic awareness training to ensure they can recognize the hazards of Blood-borne Pathogens. In addition, employees whose initial assignment to tasks where occupational exposure to blood-borne pathogens is likely to occur, must be trained at the time of initial assignment and every year thereafter.

2.1 Training will include:

2.1.1 The standard and its contents. M&M ERECTORS Blood-borne Pathogen Safety Program and methods for obtaining a copy.

2.1.2 The epidemiology and symptoms of Bloodborne diseases.

2.1.3 The modes of transmission of Bloodborne pathogens.

2.1.4 The recognition of tasks that may involve exposure.

2.1.5 The use and limitations of methods to reduce exposure, for example engineering controls, work practices and personal protective equipment (PPE).

2.1.6 The types, basis of selection, use, location, removal, handling, decontamination, and disposal of PPE.

2.1.7 The Hepatitis B vaccination, including efficacy, safety, method of administration, benefits, and that it will be offered free of charge.

2.1.8 What appropriate actions to take and persons to contact in an emergency involving blood or OPIM.

2.1.9 The procedure to follow if an exposure incident occurs, including the method of reporting and medical follow-up.

2.1.10 The evaluation and follow-up required after an employee exposure incident.

2.1.11 The signs, labels, and color-coding systems.

2.2 Additional training is provided to employees when there are any changes of tasks or procedures affecting the employees' occupational exposure.

2.3 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training.

3. Exposure Determination.

M&M ERECTORS Inc. has not determined any jobs, tasks, or employees with a high likelihood to have occupational exposure to blood or OPIM. This exposure determination is made without regard to the use of personal protective equipment (i.e., employees are considered to be exposed even if they wear personal protective equipment). In the event that employees are designated as having a high likelihood of occupational exposure to blood or OPIM the guidelines detailed in this program will be followed and the Safety Manager will ensure that all aspects of this program are enforced.

4. Engineering and Work Practice Controls.

Engineering and work practice controls will be used to eliminate or minimize exposure to employees at this company. Where occupational exposure remains after institution of these controls, employees are required to wear personal protective equipment. At this company the following engineering controls are used:

4.1 Placing sharp items (e.g., needles, broken glass, sharp debris, etc.) in puncture-resistant, leak proof, labeled containers.

4.2 Removing soiled, or contaminated PPE as soon as possible.

4.3 Cleaning and disinfecting all equipment and work surfaces potentially contaminated with blood or OPIM. **Note**: We use a solution of I/4 cup chlorine bleach per gallon of water.

4.4 Thorough hand washing with soap and water immediately after providing care or provision of antiseptic towelettes or hand cleanser where hand washing facilities are not available.

4.5 Prohibition of eating, drinking, smoking, applying cosmetics, handling contact lenses, and so on in work areas where exposure to infectious materials may occur.

5. Hand washing Facilities.

Hand washing facilities are available to employees who have exposure to blood or OPIM. Sinks for washing hands after occupational exposure are near locations where exposure to bloodbome pathogens could occur.

5.1 When circumstances require hand washing and facilities are not available, either an antiseptic cleanser and paper towels or antiseptic toilettes are provided. Employees must then wash their hands with soap and water as soon as possible.

5.2 Supervisors must make sure that employees wash their hands and any other contaminated skin after immediately removing personal protective gloves, or as soon as feasible with soap and water.

6. Work Area Restrictions.

6.1 In work areas where there is a reasonable likelihood of exposure to blood or OPIM, employees are not to eat, drink, apply cosmetics or lip balm, smoke, or handle contact lenses. Food and beverages are not to be kept in refrigerators, freezers, shelves, cabinets, or on counter tops or bench tops where blood or OPIM are present.

6.2 Mouth pipeting/suctioning of blood or OPIM is prohibited. All procedures involving blood or other potentially infectious materials will be conducted in a manner which will minimize splashing, spraying, spattering, and generation of droplets of blood or OPIM.

7. Personal Protective Equipment.

All PPE used at this facility is provided without cost to employees. PPE for employees designated as having a high likelihood of occupation exposure to blood or OPIM is chosen based on the anticipated exposure. The protective equipment is considered appropriate only if it does not permit blood or OPIM to pass through or reach the employees' clothing, skin, eyes, mouth, or other mucous membranes under normal conditions of use and for the duration of time, which the protective equipment will be used.

7.1 Employees must remove all garments, which are penetrated by blood immediately or as soon as possible.

7.2 They must remove all PPE before leaving the work area. When PPE is removed, employees place it in a designated container for disposal, storage, washing, or decontamination.

7.3 Gloves. Employees must wear gloves when they anticipate hand contact with blood, OPIM, non-intact skin, and mucous membranes when handling or touching contaminated items or surfaces.

7.3.1 Disposable gloves used at this facility are not to be washed or decontaminated for re-use and are to be replaced as soon as practical when they become contaminated or as soon as feasible if they are torn, punctured, or when their ability to function as a barrier is compromised.

7.3.2 Utility gloves may be decontaminated for re-use provided that the integrity of the glove is not compromised.

7.4 Utility gloves will be discarded if they are cracked, peelings, torn, punctured, or exhibit other signs of deterioration or when their ability to function as a barrier is compromised.

7.5 Hypoallergenic gloves, glove liners, powerless gloves, or other similar alternatives shall be readily accessible to those employees who are allergic to the gloves normally provided.

7.6 Eye and Face Shields. Employees must wear masks in combination with eye protective devices, such as goggles or glasses with solid side shield, or chin length face shields, whenever splashes, splatter, or droplets of blood or OPIM may be generated and reasonably anticipated to contaminate eye, nose, or mouth.

8. Housekeeping

8.1 All jobsites must remain clean and decontaminated at all times.

8.2 Sharp debris such as metal or glass must be placed in a proper container to avoid accidental lacerations.

8.3 Debris that may be contaminated will not be picked up directly with the hands.

8.4 Reusable sharps that are contaminated with blood or OPIM are to be stored or processed in a manner that requires employees to reach by hand into the containers where their sharps have been placed.

9. Handling Regulated Wastes.

When handling regulated wastes, other than contaminated needles and sharps, we make sure it is:

9.1 Placed in containers, which are closeable, constructed to contain all contents, and prevent fluid leaks during handling, storage, transportation, or shipping.

9.2 Labeled or color coded and closed prior to removal to prevent spillage or protrusion of contents during handling, storage, transport, or shipping.

Note: Disposal of all regulated waste is in accordance with applicable Federal, State, and Local regulations. The Safety Manager will be responsible for making arrangements to properly dispose of regulated wastes.

10. Recordkeeping.

Training records shall be maintained for three years from the date of training. Medical records shall be maintained in accordance with OSHA Standard 29 CFR 1910.20. These records shall be kept confidential, and must be maintained for at least the duration of employment plus 30 years. The records shall include the following:

10.1 The name and social security number of the employee.

10.2 A copy of the employee's HBV vaccination status, including the dates of vaccination.

10.3 A copy of all results of examinations, medical testing, and follow-up procedures.

10.4 A copy of the information provided to the healthcare professional, including a description of the employee's duties as they relate to the exposure incident, and documentation of the routes of exposure and circumstances of the exposure.

10.5 Availability. All employee records shall be made available to the employee in accordance with 29 CFR 1910.20. All employee records shall be made available to the Assistant Secretary of Labor for the Occupational Safety and Health Administration and the Director of the National Institute for Occupational Safety and Health upon request.

11. Hepatitis B Vaccination Program.

M&M ERECTORS offers the Hepatitis B vaccine and vaccination series to all employees who have occupational exposure to Bloodborne pathogens, and post exposure follow-up to employees who have had an exposure incident.

11.1 Participation in a pre-screening program is not a prerequisite for receiving Hepatitis B vaccination. If the employee initially declines Hepatitis B vaccination but at a later date while still covered under the standard decides to accept the vaccination, the vaccination will be made available. All employees who decline the Hepatitis B vaccination offered must sign the OSHA-required waiver indicating their refusal.

11.2 If a routine booster dose of Hepatitis B vaccine is recommended by the U.S. Public Health Service at a future date, such booster doses will be made available.

12. Post-Exposure Evaluation and Follow-Up.

All exposure incidents are reported, investigated, and documented. When the employee is exposed to blood or OPIM, the incident is reported to the Safety

Manager. When an employee is exposed, he or she will receive a confidential medical evaluation and follow-up, including at least the following elements:

12.1.1 Documentation of the route of exposure, and the circumstances under which the exposure-occurred.

12.1.2 Identification and documentation of the source individual, unless it can be established that identification is infeasible or prohibited by state or local law.

12.1.3 The individual's blood shall be tested as soon as feasible and after consent is obtained in order to determine HBV or HIV, infectivity. If consent is not obtained, Management establishes that legally required consent cannot be obtained. When the source individual's consent is not required by law, the source individual's blood, if available, will be tested and the results documented.

12.1.4 When the source individual is already known to be infected with HBV or HIV, testing for the source individual's known HBV or HIV status need not be repeated.

12.1.5 Results of the source individual's testing are made available to the exposed employee, and the employee is informed of applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

12.2 Collection and testing of blood for HBV/HIV serological status will comply with the following:

12.2.1 The exposed employee's blood is collected as soon as possible and tested after consent is obtained.

12.2.2 The employee will be offered the option of having their blood collected for testing of the employee's HIV/HBV serological status. The blood sample will be preserved for up to 90 days to allow the employee to decide if the blood should be tested for HIV serological status.

12.3 All employees who incur an exposure incident will be offered post-exposure evaluation and follow-up according to the OSHA standard.

12.4 The healthcare professional responsible for the employees' Hepatitis b vaccination is provided with the following:

12.4.1 A copy of 29 CFR 1910.1030.

12.4.2 A written description of the exposed employee's duties as they relate to the exposure incident-

12.4.3 Written documentation of the route of exposure and circumstances under which exposure occurred.

12.4.4 Results of the source individual blood testing, if available.

12.4.5 All medical records relevant to the appropriate treatment of the employee including vaccination status.

12.5 M&M ERECTORS obtains and provides the employee with a copy of the evaluating healthcare professional's written opinion within 15 days of the completion of the evaluation.

12.6 The healthcare professional's written opinion for HBV vaccination must be limited to whether HBV vaccination is indicated for an employee, and if the employee has received such vaccination.

12.7 The healthcare professional's written opinion for post-exposure follow-up is limited to the following information:

12.7.1 A statement that the employee has been informed of the results of the evaluation.

12.7.2 A statement that the employee has been told about any medical conditions resulting from exposure to blood or OPIM which require further evaluation or treatment.

- Note: All other findings or diagnosis shall remain confidential and will not be included in the written report**.**

13. Labels and Signs.

Biohazard labels are affixed to containers of regulated waste, refrigerators and freezers containing blood or OPIM, and other containers used to store, transport or ship blood or OPIM. The universal biohazard symbol is used. The label is fluorescent orange or orange-red. Red bags or containers may be substituted for labels. Blood products that have been released for transfusion or other clinical use are exempted from these labeling requirements.

SUBJECT: Personal Protective Equipment Program

REGULATORY STANDARD: 29 CFR 1910 Subpart I and 1926 Subpart E

GENERAL: M&M ERECTORS will ensure that jobs having a potential for employee injury within our facility(s) are evaluated and controlled. This Program is intended to address the issues of evaluating and identifying potential job hazards and identifying the personal protective equipment necessary to eliminate or minimize the risk to the employee.

RESPONSIBILITY: Effective implementation of this program requires support from all levels of management within this company. The Safety Manager is the program coordinator, acting as the representative of the company owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of the company where there is danger of serious personal injury. Supervisors are responsible to ensure that all employees are issued the necessary PPE to perform daily tasks and that PPE is worn properly.

Contents of the PPE Program

PPE PROGRAM

1. Written Program.

M&M ERECTORS will review and evaluate this Program on an annual basis or when changes to the regulations occurs that prompt revision of this document. This written program will be communicated to all personnel.

2. Specific Responsibilities.

Supervisors are responsible for identifying the type of PPE required for their subordinates and that their employees are properly trained in it's use, care, and maintenance. In addition, Supervisors will ensure that Respirators are only used when approved by the Safety Manager and in accordance with the M&M ERECTORS Respiratory Protection Program.

3. Training and Education.

Supervisors will conduct training for their employees based on the results of a task specific hazard analysis. The purpose of training and education is to ensure that the employees are sufficiently informed about the job hazards to which they may be exposed and thus are able to participate actively in their own protection.

3.1 General Training. Employees will be adequately trained about the Company's personal protective equipment program. Proper training will allow managers, supervisors, and workers to better understand the hazards associated with a job, task, or process.

3.2 Training Content. New employees and reassigned workers will receive an initial orientation and hands-on training prior to being placed in a job. The initial training program will include the following:

- 3.2.1 A description and identification of the hazards associated with particular jobs/tasks/machines/workstations.
- 3.2.2 Specific safeguards, how they provide protection, and the hazards for which they are intended.
- 3.2.3 Proper use, care, and maintenance of the necessary PPE.
- 3.2.4 Length of useful life of the equipment and the correct way to dispose of broken or damaged PPE.

3.3 Certification. Supervisors will certify that employee training has been accomplished. The Safety Manager will ensure that the training is being kept up to date. The certification shall contain each employee's name, supervisor or instructor's name, and dates of training.

3.4 Training for Supervisors. Supervisors will receive training in the necessary PPE required.

3.5 Refresher training. The training content shall be identical to initial training. Refresher training will be conducted on an annual basis or when the following conditions are met, whichever event occurs sooner.

3.6 Retraining shall be provided for all employees whenever there is a change in their job assignments, a change in machines, or equipment or processes that present a new hazard.

3.7 Additional retraining shall be conducted whenever a periodic inspection reveals, or whenever M&M ERECTORS has reason to believe, that there are deviations from or inadequacies in the employees' knowledge or use of PPE.

3.8 Certification. M&M ERECTORS shall certify that employee re-training has been accomplished and is being kept up to date. The certification shall contain each employee's name, supervisor or instructors name and dates of training.

4. Hazard Prevention and Control.

M&M ERECTORS understands that engineering solutions, where feasible, are the preferred method of control for workplace hazards. The focus of the Company's PPE Program is to eliminate hazards from the workplace. This is accomplished whenever possible by redesigning the workstation, work methods, or tool(s) to reduce the hazards associated with the demands of the job. This program will, whenever possible, research into currently available controls and technology. PPE will be a last choice.

5. Protective Clothing and Personal Protective Equipment (PPE).

Where engineering controls and job safety analyses do not eliminate all job hazards, employees will (where appropriate) wear personal protective equipment (PPE). At a minimum, the following guidelines will be followed:

5.1 General.

5.2 Loose clothing must not be worn near moving machinery.

5.3 Neckties must be securely clipped to the shirt.

5.4 Employees working in areas where chemicals, solvents, or other irritants, or caustic acids are used (i.e., tumbling room) will be supplied with face shields, chemical resistant boots, aprons, chemically protective gloves, etc.

5.5 Employees **are not** permitted to wear jewelry of any type.

5.6 Safety Glasses.

Eye Protection

- Approved safety glasses with side shields that comply with ANSI Standard Z87.1 must be worn in **all** work activity areas including, but not limited to cranes or any equipment performing work. Safety glasses will be worn under welding hoods
- Additional protection is required when working in windy or dusty conditions or with any corrosives, hot liquids or for impact protection.
- Chemical / impact resistant goggles must be carried on the hard hat ready for use.
- Ordinary "home use" prescription glasses and commercial sunglasses do not meet ANSI Z87.1 and are **NOT ALLOWED** in these areas, unless worn under approved protection (i.e., goggles or visitor specs/over glasses).
- Glasses will not be allowed to be worn under goggles if there is a possibility of splash from working with, around or near liquids/chemicals. Goggles will be carried at all times.
- Dark tinted safety glasses will not be worn during limited periods of visibility or inside buildings.

5.7 Ear Protection. Employees working in areas where the noise level is 85 decibels or higher may obtain ear protection through their supervisor or from the Safety Director. M&M ERECTORS provides hearing protection to the employees. Further information can be found in the M&M ERECTORS Hearing Conservation Program.

5.8 Foot Protection. All employees will wear substantial work boots with fully enclosed coverings to protect their feet and toes. For those employees who work in areas where safety shoes are recommended, the employee will be responsible for purchasing the work boots at his/her own cost. The safety shoes must meet federal standards and can be purchased through several local suppliers. Approved means “Safety shoes having a rigid toe of steel or similar material” meeting the ANSI Z-41 standard and should have a defined heel for climbing

5.9 Hair/Head Protection. Employees must wear OSHA standard Z89.1 protective hard hat at all times. The hardhats will be supplied by the company.

5.10 Operators of forklifts will wear a hard hat when operating the vehicle.

5.11 It is recommended that all employees maintain their hair at all times. If

you must have long hair keep it tucked under your hard hat while working on jobs.

5.12 Hand Protection. The supervisor must ensure that the hazards to employees hands are evaluated and, if risks exist, provide appropriate hand protection suitable for the needs of the job. Hazards may include those from skin absorption of harmful substances, severe cuts or lacerations, severe abrasions, punctures, chemical or thermal burns, and harmful temperature extremes. Performance characteristics of the hand protection should be evaluated relative to the tasks to be performed, the conditions present, duration of the use, and the hazards or potential hazards identified.

5.13 Work gloves (leather-palmed) must be worn by anyone handling raw materials other than chemicals.

5.14 Supervisors are responsible to assure that employees wear the appropriate hand protection (gloves) depending on the job task.

5.15 Respiratory Protection. Supervisors are responsible to ensure that Respirators, to include a dust mask (Filtering Face-piece) are only used when approved by the Safety Manager and in accordance with the M&M ERECTORS Respiratory Protection Program.

SUBJECT: Respiratory Protection Program

REGULATORY STANDARD: OSHA - 29 CFR 1910.134

GENERAL: M&M ERECTORS will ensure that respiratory hazards at our jobsites are evaluated, and that information concerning these hazards is transmitted to all employees. This Program is intended to address the issues of evaluating the potential respiratory hazards, communicating information concerning these hazards, and establishing appropriate engineering, work practice, or respiratory protective measures for employees. M&M ERECTORS has not identified any jobsites or tasks, which require the mandatory use of respirators. In the event that individual employees are required to use respiratory protection or desire to use respirators on a voluntary basis, the following guidelines will be followed. The only respiratory protection that is voluntary is partical mask. If a task requires more extensive protection respirators are to be worn.

RESPONSIBILITY: The Safety Manager is the program administrator, acting as the representative of the company owners, who have the ultimate responsibility for all facets of this program. The Safety Manager has full authority to make necessary decisions to ensure success of the program. Supervisors are required to be familiar with the contents of this program, will ensure the program is followed by their subordinates on a daily basis. Supervisors will ensure that Respirators are only used when approved by the Safety Manager and in accordance with this Program. Supervisors will also ensure that employees who desire to wear respirators on a voluntary basis are provided with the proper information in accordance with the guidelines of this program.

Contents of the Respiratory Protection Program

RESPIRATORY PROTECTION PROGRAM

1. Written Program.

M&M ERECTORS will develop and implement a written respiratory protection program with required worksite-specific procedures and elements for required respirator use. The program will be administered by the Safety Manager who will be referred to as the program administrator. The program administrator will review and evaluate this Program:

1.1 On at least an annual basis.

1.2 When changes occur to governing regulatory sources that require revision.

1.3 When changes occur to any related company procedures that require a revision.

1.4 When there is an accident or near miss that relates to this area of safety.

2. Specific Responsibilities.

2.1 Safety Manager. The Safety Manager is responsible to ensure that the M&M ERECTORS Respiratory Protection Program are specific and applicable to all job sites. In addition, the Safety Manger will change, amend, and update this program as necessary when it is evident that employees of M&M ERECTORS will be required to wear respiratory protection.

2.2 Supervisors. Supervisors are responsible to notify the Safety Manager when they have identified areas or tasks that mandate the use of respiratory protection equipment.

2.3 Sub-Contractors. Sub-contractors will be required to follow the requirements detailed in this program and those requirements as outlined in the OSHA Regulation. Sub-contractors who have employees required to wear respirators must make available to M&M ERECTORS proper documentation of medical evaluations, training, and fit testing.

3. Training Requirements.

3.1 General. All employees of M&M ERECTORS receive orientation training that explains the basic types of respiratory hazards and recognition of respiratory hazards in the workplace. In addition, all employees are made aware that respirators may be worn as a voluntary practice in certain work areas with prior approval of their Supervisor. Prior to any employees being assigned the use of a respirator those individuals must receive additional training as

outlined in this program.

3.2 Basic advisory information. The basic advisory information on respirators, as presented in 29 CFR 1910.134, will be provided by M&M ERECTORS in any written or oral format to employees who wear respirators.

3.3 Frequency of training. Training will be provided to each affected employee:

3.3.1 Before the employee is first assigned duties that require respiratory protection.

3.3.2 Before there is a change in assigned duties.

3.3.3 Whenever there is a change in operations that present a hazard for which an employee has not previously been trained.

3.3.4 Whenever M&M ERECTORS has reason to believe that there are deviations from established respiratory procedures required by this instruction or inadequacies in the employee's knowledge or use of these procedures.

3.4 Training Content. Training of employees will as a minimum include:

3.4.1 Putting on and removing respirators (donning and doffing).

3.4.2 Any limitations on their use.

3.4.3 Maintenance requirements.

3.4.4 Procedures for regularly evaluating the effectiveness of the program.

3.4.5 Where respirator use is not required.

3.5 Demonstration of knowledge. M&M ERECTORS will ensure that each employee can demonstrate knowledge of at least the following:

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

3.5.2 What the limitations and capabilities of the respirator are;

3.5.3 How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions;

3.5.4 How to inspect, put on and remove, use, and check the seals of the respirator;

3.5.5 What the procedures are for maintenance and storage of the respirator;

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

3.5.7 The general requirements of 29 CFR 1910.134.

3.6 Employee proficiency. The training will establish employee proficiency in the duties required by this instruction and will introduce new or revised procedures, as necessary, for compliance with this instruction or when future revisions occur.

3.7 Trainer qualification. M&M ERECTORS has designated the Safety Manager as a program administrator who is qualified by appropriate training or experience that is commensurate with the complexity of the program to administer or oversee this respiratory protection program and conduct the required evaluations of program effectiveness.

3.8 Training certification. M&M ERECTORS will certify that the training required by 29 CFR 1910.134 has been accomplished. The certification will contain each employee's name, the signatures or initials of the trainers, and the dates of training. The certification will be available for inspection by employees and their authorized representatives.

3.9 Retraining and Refresher Training. Retraining will be administered annually. Retraining will reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary. Retraining will be administered when the following situations occur (as a minimum):

3.9.1 Changes in the workplace or the type of respirator render previous training obsolete;

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

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

4. Hazard Evaluation.

M&M ERECTORS will identify and evaluate the respiratory hazard(s) in the workplace using the Job Safety Analysis/PPE Program. If respiratory hazards are identified the type(s) or contaminants, duration of exposure, and chemical form (solid, liquid, gas, etc.) must be provided to the Safety Manager. The Safety Manager will then determine to what extent respiratory protection must be provided and will make the necessary changes to this program to ensure compliance with the OSHA regulations and to provide a safe work environment for employees.

5. Program Requirements.

When determined by the Safety Manager that respirators are required to be worn by employees this program containing the following minimum requirements will be implemented:

5.1 Procedures for selecting respirators for use in the workplace;

5.2 Medical evaluations of employees required to use respirators;

5.3 Fit testing procedures for tight-fitting respirators;

5.4 Procedures for proper use of respirators in foreseeable emergency situations;

5.5 Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators;

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

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

6. Voluntary Use of Respirators.

M&M ERECTORS may provide respirators at the request of employees or permit employees to use their own respirators; if it is determined that such respirator use will not in itself create a hazard. If voluntary respirator use is permissible, M&M ERECTORS will provide the respirator user(s) with the information contained in Appendix A to ensure safe and effective use. In addition, voluntary respirator use when approved by the Safety Manager will be limited to only the use of a dust mask (Filtering Face-piece).

7. Respiratory Selection.

When respirators are required to be used by M&M ERECTORS employees the selection of respirators will be made by the Safety Manager according to the specific hazard(s) involved.

7.1 Filter cartridges and canisters. Filter cartridges and canisters will use and stored according manufacturers guidelines. Change-out of filters will be done based on the individual job.

7.2 Identification of filters, cartridges, and canisters. M&M ERECTORS will ensure that all filters, cartridges and canisters used in the workplace are labeled and color coded with the NIOSH approved label and that the label is not removed and remains legible.

7.3 Specific OSHA standards. Each task/job having the potential for respiratory hazards will be evaluated to determine worker protection requirements. **The Safety Manager will refer to applicable OSHA Regulations to determine if specific requirements exist.** The standards are listed in the "Z" tables to 29 CFR 1910.1000-1101.

7.4 Where a specific OSHA standard does not exist, prudent Industrial Hygiene practices will be used. After all criteria have been identified and evaluated and after the requirements and restrictions of the respiratory protection

program have been met, the class of respirators that should provide adequate respiratory protection will be determined.

7.5 Air quality. Compressed air, compressed oxygen, liquid air, and liquid oxygen used for respiration will be of high purity.

7.5.1 Oxygen will meet the requirements of the United States Pharmacopoeia for medical or breathing oxygen.

7.5.2 Breathing air will meet at least the requirements of the specification for Grade D breathing air as described in Compressed Gas Association Commodity Specification G-7.1-1966.

7.5.3 Compressed oxygen will not be used in supplied-air respirators or in open circuit self-contained breathing apparatus that have previously used compressed air. Oxygen must never be used with airline respirators. Breathing air may be supplied to respirators from cylinders or air compressors.

7.5.3.1 Compressed breathing air will meet at least the requirements for Type 1-Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:

1.Oxygen content (v/v) of 19.5-23.5%;
2.Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;
3.Carbon monoxide (CO) content of 10 ppm or less;
4.Carbon dioxide content of 1,000 ppm or less; and
5.Lack of noticeable odor.

7.5.4 Compressed oxygen will not be used in supplied-air respirators or in open circuit self-contained breathing apparatus that have previously used compressed oxygen.

7.5.5 Supplied Air. Compressors purchased by this company for supplying air will be equipped with the necessary safety and standby devices. A breathing-air type compressor will be used.

7.5.6 Airline couplings used will be incompatible with outlets for other gas systems to prevent inadvertent servicing of airline respirators with nonrespirable gases or oxygen.

7.5.7 Breathing gas containers will be properly marked and stored in accordance with 29 CFR 1910.101.

8. Respirator Inspection, Maintenance, and Care.

M&M ERECTORS will provide for the cleaning and disinfecting, storage, inspection, and repair of respirators used by our employees. Equipment will be properly maintained to retain its original state of effectiveness.

8.1 Cleaning and disinfecting. M&M ERECTORS will provide each respirator

user with a respirator that is clean, sanitary, and in good working order. M&M ERECTORS will ensure that respirators are cleaned and disinfected using OSHA approved procedures or procedures recommended by the respirator manufacturer, provided that such procedures are of equivalent effectiveness. The respirators will be cleaned and disinfected at the following intervals:

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

8.3 Respirators issued to more than one employee. Respirators issued to more than one employee will be cleaned and disinfected before being worn by different individuals.

8.4 Respirators maintained for emergency. Respirators maintained for emergency use will be cleaned and disinfected after each use.

8.5 Respirators used in fit testing. Respirators used in fit testing and training will be cleaned and disinfected after each use.

8.6 Storage of respirators. Respirators will be stored as follows:

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

8.7 Inspection. Respirators will be inspected as follows:

8.7.1 All respirators used in routine situations will be inspected before each use and during cleaning in accordance with manufacturer’s specifications.

8.7.2 A check of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the face piece, head straps, valves, connecting tube, and cartridges, canisters or filters; and

8.7.3 A check of elastic parts for pliability and signs of deterioration.

8.8 Repairs. Respirators that fail an inspection or are otherwise found to be defective will be removed from service, and discarded, repaired or adjusted only by persons appropriately trained to perform such operations and will use only the respirator manufacturer's NIOSH-approved parts designed for the respirator. Specific procedures for disassembly, cleaning and maintenance of respirators used by this company will be done according the manufacturer’s written instructions.

8.9 Routine use respirators. All routine use respirators will be inspected before

and after each use. The respirator manufacturer's inspection criteria will be used as the basis for the inspection. Routinely used respirators will be collected, cleaned, and disinfected as frequently as necessary to ensure that proper protection is provided for the wearer.

8.9.1 Routine use respirators. Routinely used respirators, such as dust respirators, may be placed in plastic bags. Respirators having removable cartridges with imbedded compounds that could evaporate into a sealed bag should be removed so as not to permeate into the rubber parts of the respirator. Respirators should not be stored in such places as lockers or toolboxes unless they are in carrying cases or cartons.

9. Respirator Fit Testing.

M&M ERECTORS will conduct fit testing before an employee is required to use any respirator. The employee must be fit tested with the same make, model, style, and size of respirator that will be used.

9.1 M&M ERECTORS will establish a record of the qualitative (QLFT) and/or quantitative (QNFT) fit tests administered to an employee including:

- Date of test
- Type of fit test performed
- The name or identification of the employee tested;
- Specific make, model, style, and size of respirator tested
- Fit test records will be retained for respirator users until the next fit test is administered;
- The pass/fail results for QLFTs or the fit factor and strip chart recording or other recording of the test results for QNFTs.

9.2 Tight-fitting face piece respirators. M&M ERECTORS will ensure that employees using a tight-fitting facepiece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT). Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators will be accomplished by performing quantitative or qualitative fit testing in the negative pressure mode, regardless of the mode of operation (negative or positive pressure) that is used for respiratory protection. Additionally, we will ensure that an employee using a tight-fitting facepiece respirator is fit tested;

9.2.1 After completion of a Medical Evaluation (See Section)

9.2.2 Prior to initial use of the respirator

9.2.3 Whenever a different face piece (size, style, model or make) is used

9.2.4 At least annually thereafter.

9.3 Additional fit test requirements. We will conduct an additional fit test whenever changes in the employee's physical condition occur that could

affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight. Additionally, if after passing a QLFT or QNFT, the fit of the respirator is unacceptable, the employee will be given a reasonable opportunity to select a different respirator face piece and to be retested.

10. Medical Evaluation.

Using a respirator may place a physiological burden on employees that varies with the type of respirator worn, the job and workplace conditions in which the respirator is used, and the medical status of the employee. M&M ERECTORS will provide a medical evaluation to determine the employee's ability to use a respirator before the employee is fit tested or required to use the respirator in the workplace. M&M ERECTORS may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

10.1 Medical evaluation procedures. M&M ERECTORS will identify a **P**hysician or other **L**icensed **H**ealth **C**are **P**rofessional (PLHCP) to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire.

10.2 Follow-up medical examination. M&M ERECTORS will ensure that a follow-up medical examination is provided for an employee who gives a positive response to any question among questions 1 through 8 in the medical evaluation questionnaire and/or demonstrates the need for a follow-up medical examination. The follow-up medical examination will include any medical tests, consultations, or diagnostic procedures that the PLHCP deems necessary to make a final determination.

10.3 Information to be provided to the PLHCP. The following information will be provided to the PLHCP before he or she makes a recommendation concerning an employee's ability to use a respirator:

10.3.1 The expected physical work effort;

10.3.2 Additional protective clothing and equipment to be worn;

10.3.3 Temperature and humidity extremes that may be encountered;

10.3.4 The type and weight of the respirator to be used by the employee;

10.3.5 The duration and frequency of respirator use (including use for rescue and escape);

10.3.6 Any supplemental information provided previously to the PLHCP regarding an employee need not be provided for a subsequent medical evaluation if the information and the PLHCP remain the same;

10.3.7 Copy of the written respiratory protection program;

10.3.8 Copy of the 29 CFR 1910.134 plus Appendices.

10.4 Additional medical evaluations. As a minimum, M&M ERECTORS will provide additional medical evaluations based on the following conditions:

10.4.1 If an employee reports medical signs or symptoms that are related to his or her ability to use a respirator;

10.4.2 If a PLHCP, supervisor, or the respirator program administrator informs M&M ERECTORS that an employee needs to be reevaluated;

10.4.3 If information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee reevaluation; or

10.4.4 If a change occurs in workplace conditions (e.g., physical work effort, protective clothing, temperature) that may result in a substantial increase in the physiological burden placed on an employee.

11. Definitions.

Air-purifying respirator means: A respirator with an air-purifying filter, cartridge, or canister that removes specific air contaminants by passing ambient air through the air-purifying element.

Atmosphere-supplying respirator means: A respirator that supplies the respirator user with breathing air from a source independent of the ambient atmosphere, and includes supplied-air respirators (SARs) and self-contained breathing apparatus (SCBA) units.

Employee exposure means: Exposure to a concentration of an airborne contaminant that would occur if the employee were not using respiratory protection.

Filter or air purifies element means: A component used in respirators to remove solid or liquid aerosols from the inspired air.

Filtering face piece (dust mask) means: A negative pressure particulate respirator with a filter as an integral part of the face piece or with the entire face piece composed of the filtering medium.

RESPIRATOR PROGRAM EVALUATION CHECKLIST

In general, the respirator program should be evaluated for each job or at least annually, with program adjustments, as appropriate, made to reflect the evaluation results. Program function can be separated into administration and operation.

A. PROGRAM ADMINISTRATION

1. Is there a written policy, which acknowledges employer responsibility for providing a safe and healthful workplace, and assigns program responsibility, accountability, and authority?

2. Is the program responsibility vested in one individual who is knowledgeable and who can coordinate all aspects of the program at the job-site?

3. Can feasible engineering controls or work practices eliminate the need for respirators?

4. Are there written procedures/statements covering the various aspects of the respirator program, including:

   - ❑ Designation of an administrator;
   - ❑ Respirator selection;
   - ❑ Purchase of MSHA/NIOSH certified equipment;
   - ❑ Medical aspects of respirator usage;
   - ❑ Issuance of equipment;
   - ❑ Fitting;
   - ❑ Training;
   - ❑ Maintenance, storage, and repair;
   - ❑ Inspection;
   - ❑ Use under special condition; and
   - ❑ Work area surveillance?

B. PROGRAM OPERATION

1. Respiratory protective equipment selection

   - ❑ Are work area conditions and worker exposures properly surveyed?
   - ❑ Are respirators selected on the basis of hazards to which the worker is exposed?
   - ❑ Are selections made by individuals knowledgeable of proper selection procedures?
   - ❑ Are only certified respirators purchased and used; do they provide adequate protection for the specific hazard and concentration of the contaminant?
   - ❑ Has a medical evaluation of the prospective user been made to determine physical and psychological ability to wear the selected respiratory protective equipment?
   - ❑ Where practical, have respirators been issued to the users for their exclusive use, and are there records of issuance?

2. Respiratory protective equipment fitting:

   - ❑ Are the users given the opportunity to try on several respirators to determine whether the respirator they will subsequently be wearing is the best fitting one?
   - ❑ Is the fit tested at appropriate intervals?
   - ❑ Are those users who require corrective lenses properly fitted?
   - ❑ Are users prohibited from wearing contact lenses when using respirators?
   - ❑ Is the face-piece-to-face-seal tested in a test atmosphere?
   - ❑ Are workers prohibited from wearing respirators in contaminated work areas when they have facial hair or other characteristics may cause face-seal leakage?

3. Respirator use in the work area

   - ❑ Are respirators being worn correctly (i.e., head covering over respirator straps)?
   - ❑ Are workers keeping respirators on at all times while in the work area?

4. Maintenance of respiratory protective equipment

   ### *Cleaning and Disinfecting*

   - ❑ Are respirators cleaned and disinfected after each use when different people use the same device, or as frequently as necessary for devices issued to individual users?

- ❑ Are proper methods of cleaning and disinfecting utilized?

Storage

- ❑ Are respirators stored in a manner so as to protect them from dust, sunlight, heat, excessive cold or moisture, or damaging chemicals?
- ❑ Are respirators stored properly in a storage facility so as to prevent them from deforming?
- ❑ Is storage in lockers and tool boxes permitted only if the respirator is in a carrying case?

Inspection

- ❑ Are respirators inspected before and after each use and during cleaning?
- ❑ Are qualified individuals/users instructed in inspection techniques?
- ❑ Is respiratory protective equipment designated as “emergency use” inspected at least monthly (in addition to after each use)?
- ❑ Are SCBA incorporating breathing gas containers inspected weekly for breathing gas pressure?
- ❑ Is a record kept of the inspection of “emergency use” respiratory protective equipment?

Repair

- ❑ Are replacement parts used in respirator those of the manufacturer of the respirator?
- ❑ Are repairs made by manufacturers or manufacturer-trained individuals?

5. Special use conditions
   - ❑ Is a procedure developed for respiratory protective equipment usage in atmosphere immediately dangerous to life or health?
   - ❑ Is a procedure developed for equipment usage for entry into confined spaces?

6. Training
   - ❑ Are users trained in proper respirator use, cleaning, and inspection?
   - ❑ Are users trained in the basis for selection of respirators?
   - ❑ Are users evaluated, using competency-based evaluation, before and after training?

SUBJECT: Fall Protection Program

REGULATORY STANDARDS: OSHA - 29 CFR 1910.66
29 CFR 1926.104
29 CFR 1926.500

GENERAL: M&M ERECTORS will ensure that the hazards of all elevated falls over 6 feet in length, within our facilities are evaluated, and that information concerning their hazards is transmitted to all employees. This Program is intended to address the issues of evaluating potential fall hazards, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received the fall protection training before working in any areas where fall hazards exist. Subcontractors will be required to provide a written fall protection program that describes the subcontractors fall protection policies and procedures when they will be working at elevated heights.

Contents of the Fall Protection Program

FALL PROTECTION PROGRAM

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations, when operational changes occur that require a revision of this document, when there is an accident or near miss that relates to this area of safety, or any time fall protection procedures fail.

2. Training Requirements.

Under no circumstances shall employees work in areas where they might be exposed to fall hazards, do work requiring fall protection devices, or use fall protection devices until they have completed fall protection training. M&M ERECTORS will provide training to ensure that the purpose, function, and proper use of fall protection are understood by employees and that the knowledge and skills required for the safe application and usage is acquired by employees.

2.1 Training will be conducted by the Safety Manager or other designated competent personnel. The program will include but will not be limited to:

2.1.1 A description of fall hazards in the work area.

2.1.2 Types of fall protection systems appropriate for use such as guardrails, warning lines, and fall arrest systems.

2.1.3 Selection and use of personal fall arrest systems, including application limits, proper anchoring and tie-off techniques, estimation of free fall distance, methods of use, and inspection and storage procedures.

2.1.4 Recognition of the hazards of falling from elevations and to avoid falls from grade level to lower levels through holes or openings in walking/working surfaces.

2.1.5 Procedures for removal of protection devices from service for repair or replacement.

2.2 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training.

2.3 Retraining. This Program will be provided to, and read by all employees receiving refresher training. The training content will be identical to initial training. Refresher training will be conducted on an annual basis or when the following conditions are met, whichever event occurs sooner.

2.3.1 Retraining will be provided for all authorized and affected employees whenever (and prior to) a change in their job assignments, a change in the type of fall protection equipment used, or when a known hazard is added to the work environment

which affects the fall protection program.

2.3.2 Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever M&M ERECTORS has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of fall protection equipment or procedures.

2.3.3 Whenever a fall protection procedure fails.

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

2.4 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training.

3. Jobsite/Workarea Evaluation.

All jobsites or work areas will be assessed by the Supervisor before each assigned job for potential fall hazards. A fall hazards assessment sheet (see appendix) or Job Safety Analysis (JSA) sheet will be used to document fall hazard assessments. A proper fall protection system will be used for jobs requiring fall protection when elimination of the hazard(s) is not possible.

3.1 When evaluating the fall hazards of jobsites or work areas Supervisors must consider the following:

3.1.1 Must the work be performed at an elevation?

3.1.2 Are there any floor holes or openings greater than 2 inch in diameter?

3.1.3 Can a standard guardrail system be installed?

3.1.4 Can a barricade system be implemented?

3.1.5 Will warning line systems be sufficient protection?

3.1.6 Can Aerial Lifts or Platforms be used to increase worker safety?

3.1.7 Will the use of a fall arrest system be required?

3.1.8 Will a detailed, job-specific, fall protection plan be required?

4. Fall Protection Systems.

When fall hazards cannot be eliminated through any other means, fall arrest systems will be used to control falls. Proper training on the use of fall arrest equipment is essential and will be provided prior to use. Supervisors will identify what types of fall protection systems can be used when conducting the job safety analysis for the jobsite. Supervisors must consult with the Safety Manager prior to implementation of any fall protection system. The following systems have been

identified by M&M ERECTORS as generally accepted for work conducted at our job sites.

4.1 Floor Holes. Employees must be protected from falling through or into floor holes at or above 2 inches in diameter as follows:

4.1.1 All covers shall be color-coded or marked with the word "HOLE" or "COVER" to provide warning of the hazard.

4.1.2 Covered with plywood or other material of sufficient strength capable of supporting, without failure, at least twice the weight of employees, equipment, and materials that may be imposed on the cover at any one time.

4.1.3 All covers shall be secured when installed so as to prevent accidental displacement by the wind, equipment, or employees.

4.2 Guard Rail Systems. Guard rail systems must meet these minimum requirements:

4.2.1 Have a top rail height of 42” (plus or minus 3”)

4.2.2 Have a proper midrail no less than 21” high

4.2.3 Have a top rail able to withstand 200 lbs downward/outward force

4.2.4 Have a midrail able to withstand 150 lbs downward/outward force

4.2.5 Have a toe board minimum of 3 1/2 inches in vertical height from the top edge to the level of the walking surface.

4.2.6 Toe boards must not have more than 1/4 inch clearance above the walking surface.

4.2.7 Toe boards must be solid or have openings not over 1 inch in greatest dimension.

4.2.8 If the top rail is made of wire rope it must be flagged every 6 feet

4.2.9 All rails must be a minimum of 1/4” diameter or greater

4.3 Warning Line Systems. Warning line systems consist of ropes, wires, or chains, and supporting stanchions and are set up as follows:

4.3.1 Flagged at not more than 6-foot (1.8 meters) intervals with high-visibility material.

4.3.2 Lowest point including sag is no less than 34 inches (0.9 meters) from the surface and highest point is no more than 39 inches (1 meter) from the surface.

4.3.3 Stanchions shall be capable of resisting, without tipping over, a force of at least 16 pounds applied horizontally against the stanchion, 30 inches (0.8 meters) above the walking/working surface, perpendicular to the warning line and in the direction of the

floor, roof, or platform edge.

4.4 Fall Arrest System. A full body harness system consists of a full-body harness, lanyard, energy shock absorber, and self-locking snap hook. Before using a full-body harness system, the supervisor and/or the user must address such issues as:

4.4.1 Has the user been trained to recognize fall hazards and to use fall arrest systems properly?

4.4.2 Are all components of the system compatible according to the manufacturer's instructions?

4.4.3 Have appropriate anchorage points and attachment techniques been reviewed?

4.4.4 Has free fall distance been considered so that a worker will not strike a lower surface or object before the fall is arrested?

4.4.5 Have swing fall hazards been eliminated?

4.4.6 Have safe methods to retrieve fallen workers been planned?

4.4.7 Has the full-body harness and all of its components been inspected both before each use and on a regular semi-annual basis?

4.4.8 Is any of the equipment, including lanyards, connectors, and lifelines, subject to such problems as welding damage, chemical corrosion, or sandblasting operations?

4.4.9 Will it meet these minimum requirements:

4.4.9.1 Limit maximum arresting force on an employee to 1,800 pounds

4.4.9.2 Be rigged so that an employee can neither free fall more than 6 feet (1.8 meters) nor contact any lower level;

4.4.9.3 Bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet (1.07 meters); and

4.4.9.4 Have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet (1.8 meters) or the free fall distance permitted by the system, whichever is less.

4.4.9.5 Have proper anchorage points used for attachment of personal fall arrest equipment capable of supporting at least 5,000 pounds per employee attached.

5. Inspection and Maintenance.

To ensure that fall protection systems are ready and able to perform their required tasks, inspections and maintenance will be conducted. The following as a minimum, will comprise the basic requirements of the inspection and maintenance program:

5.1 Floor hole covers, guardrails, and warning lines will be inspected periodically throughout the day to ensure they have not been defected, broken, moved, or knocked over. Any problems found with them should be reported immediately to the Supervisor and must be remedied as soon as possible after discovery. Equipment manufacturer's instructions will be incorporated into the inspection and preventive maintenance procedures.

5.2 Fall arrest systems must be inspected by the user before, after every use, and according to manufacturer's specifications.

5.3 Any fall protection equipment subjected to a fall or impact load will be removed from service immediately and turned into the Supervisor and/or Safety Manager.

5.4 The user will inspect anchors and mountings before each use for signs of damage.

6. Definitions.

Anchorage means a secure point of attachment for lifelines, lanyards or deceleration devices.

Body belt means a strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

Body harness means straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest and shoulders with means for attaching it to other components of a personal fall arrest system.

Competent person means a person who is capable of identifying hazardous or dangerous conditions in any personal fall arrest system or any component thereof, as well as in their application and use with related equipment.

Connector means a device, which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabineer, or it may be an integral component of part of the system.

Deceleration device means any mechanism with a maximum length of 3.5 feet, such as a rope grab, rip stitch lanyard, tearing or deforming lanyards, self-retracting lifelines, etc. which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

Energy shock absorber means a device that limits shock-load forces on the body.

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

Fall arrest system means a system specifically designed to secure, suspend, or assist in retrieving a worker in or from a hazardous work area. The basic components of a fall arrest system include anchorage, anchorage connector, lanyard, shock absorber, harness, and self-locking snap hook.

Free fall means the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

Free fall distance means the vertical displacement of the fall arrest attachment point on the employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall (maximum of 6 feet). This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

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

Lanyard means a flexible line of rope, wire rope, or strap, which generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline or anchorage.

Personal fall arrest system means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these. As of January 1, 1998, the use of a body belt for fall arrest is prohibited.

Snaphook means a connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types:

1. The locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or
2. The non-locking type with a self-closing keeper, which remains closed until, pressed open for connection or disconnection. As of January 1, 1998, the use of a non-

locking snaphook as part of personal fall arrest systems and positioning device systems is prohibited.

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

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

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

Work area means that portion of a walking/working surface where job duties are being performed.

SUBJECT: Stairway and Ladder Safety Program.

REGULATORY STANDARDS: OSHA 29 CFR 1910.24 -.27
OSHA 29 CFR 1926 Subpart X

GENERAL: M&M ERECTORS will ensure that all potential hazards regarding Stairways and Ladders within our facility(s) are evaluated. This program is intended to address comprehensively the issues of evaluating and identifying potential deficiencies, evaluating the associated potential hazards, communicating information concerning these hazards, and establishing appropriate procedures, and protective measures for employees.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received training before assignment to work.

Contents Stairway and Ladder Safety Program

STAIRWAY AND LADDER SAFETY PROGRAM

1. Written program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations, or when operational changes occur that require a revision of this document.

2. Training Requirements.

M&M ERECTORS will provide training to ensure that the purpose, function, and proper use of ladders and stairs is understood by employees and that the knowledge and skills required for the safe application, and usage is acquired by employees.

2.1 Training will be conducted by the Safety Manager or other designated competent personnel. The program will include but will not be limited to:

2.1.1 Recognition and description of ladder/stairway hazards in the work area.

2.1.2 Types of ladders appropriate for use.

2.2 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training.

2.3 Retraining. The training content will be identical to initial training. Refresher training will be conducted on an annual basis or when the following conditions are met, whichever event occurs sooner.

2.3.1 Retraining will be provided for all affected employees whenever (and prior to) a change in their job assignments, a change in the type of equipment used, or when a known hazard is added to the work environment which affects the fall protection program.

2.3.2 Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever M&M ERECTORS has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of fall protection equipment or procedures.

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

2.4 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training.

3. Stairway Safety.

3.1 All stairways shall be kept clean, orderly, and free of known hazards.

3.2 Cleaning requirements. To facilitate cleaning, all stairways shall be kept free from protruding nails, splinters, holes, or loose boards or other hindrances that would prevent efficient maintenance.

3.3 Stairways leading to work stations shall be maintained in a clean and, so far as possible, a dry condition. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats, or other dry standing places will be provided where practicable.

3.4 Stairways leading to emergency exit doors will be kept free of obstructions at all times. Any employee finding an emergency route blocked should immediately report the condition to the Supervisor for correction. Exit lights and signs will also be maintained in proper condition at all times and immediately reported if deficient.

3.5 Illumination. Sufficient illumination will be provided in all areas at all times especially where stairways and ladders are in use.

3.6 Stair treads. All treads shall be reasonably slip-resistant and the nosing shall be of nonslip finish. Welded bar grating treads without nosing are acceptable providing the leading edge can be readily identified by personnel descending the stairway and provided the tread is serrated or is of definite nonslip design. Rise height and tread width shall be uniform throughout any flight of stairs including any foundation structure used as one or more treads of the stairs.

4. Ladder Safety.

To insure safety and serviceability the following precautions concerning the care and use of ladders will be observed:

4.1 Care. The following safety precautions shall be observed in connection with the care of ladders:

4.1.1 Ladders shall be maintained in good condition at all times, the joint between the steps and side rails shall be tight, all hardware and fittings securely attached, and the movable parts shall operate freely without binding or undue play.

4.1.2 Metal bearings of locks, wheels, pulleys, etc., shall be frequently lubricated.

4.1.3 Frayed or badly worn rope shall be replaced.

4.1.4 Safety feet and other auxiliary equipment shall be kept in good

condition to insure proper performance.

4.1.5 Ladders shall be inspected frequently and those which have developed defects shall be withdrawn from service for repair or destruction and tagged or marked as "Dangerous, Do Not Use."

4.1.6 Rungs should be kept free of grease and oil.

4.2 Use. The following safety precautions shall be observed in connection with the use of ladders:

4.2.1 Portable rung and cleat ladders shall, where possible, be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder (the length along the ladder between the foot and the top support). The ladder shall be so placed as to prevent slipping, or it shall be lashed, or held in position.

4.2.2 Ladders shall not be used in a horizontal position as platforms, runways, or scaffolds.

4.2.3 Ladders for which dimensions are specified should not be used by more than one man at a time or with ladder jacks and scaffold planks.

4.2.4 Portable ladders shall be so placed that the side rails have a secure footing. The top rest for portable rung and cleat ladders shall be reasonably rigid and shall have ample strength to support the applied load.

4.2.5 Ladders shall not be placed in front of doors opening toward the ladder unless the door is blocked upon, locked, or guarded.

4.2.6 Ladders shall not be placed on boxes, barrels, or other unstable bases to obtain additional height.

4.2.7 Ladders will not be used on top of scaffolds.

4.2.8 Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment shall not be used; improvised repairs shall not be made.

4.2.9 Short ladders shall not be spliced together to provide long sections.

4.2.10 Ladders made by fastening cleats across a single rail shall not be used.

4.2.11 Ladders shall not be used as guys, braces, or skids, or for other than their intended purposes.

4.2.12 Tops of the ordinary types of stepladders shall not be used as steps.

4.2.13 Portable rung ladders with reinforced rails shall only be used with the metal reinforcement on the under side.

4.2.14 No ladder should be used to gain access to a roof or another level unless the top of the ladder shall extend at least 3 feet above the point of support, at eaves, gutter, or roofline.

4.2.15 Middle and top sections of sectional or window cleaner's ladders should not be used for bottom section unless they are equipped with safety shoes.

4.2.16 All portable rung ladders will be equipped with nonslip bases when there is a hazard of slipping. Nonslip bases are not intended as a substitute for care in safely placing, lashing, or holding a ladder that is being used upon oily, metal, concrete, or slippery surfaces.

4.2.17 The bracing on the back legs of stepladders is designed solely for increasing stability and not for climbing.

5. Inspections.

The employee using the ladder or Supervisor in charge, to ensure safety and serviceability, will inspect ladders before every use. Ladders will be maintained in a good usable condition at all times.

SUBJECT: Scaffold And Aerial Lift Safety Program

REGULATORY STANDARDS: OSHA - 29 CFR 1926 Subpart L

GENERAL: M&M ERECTORS will ensure that the hazards associated with working on or from evaluated platforms such as scaffolds and aerial lifts are evaluated and that information concerning their hazards is transmitted to all employees. This Program is intended to address the issues of evaluating these potential hazards, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received proper fall protection, scaffold, and aerial lift training before working from scaffolds or aerial lifts.

Contents of the Scaffold and Aerial Lift Safety Program

SCAFFOLD AND AERIAL LIFT SAFETY PROGRAM

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations, when operational changes occur that require a revision of this document, or when there is an accident or near miss that relates to this area of safety.

2. Training Requirements.

Our employees who perform work on scaffolds will be trained by a qualified person to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. Supervisors will ensure that all employees have been trained prior to working from the scaffolds.

2.1 The training will include the following areas as applicable:

- 2.1.1 The nature of and the correct procedures for dealing with electrical hazards.
- 2.1.2 The nature of and the correct procedures for erecting, maintaining, and disassembling the fall protection and falling object protection systems used.
- 2.1.3 The proper use of the scaffold and the proper handling of materials on the scaffold.
- 2.1.4 The maximum intended load and the load-carrying capacities of the scaffolds used.
- 2.1.5 Any other pertinent requirements of the OSHA rules description of fall hazards in the work area or job site.
- 2.1.6 Procedures for using fall prevention and protection systems.
- 2.1.7 Scaffolding access and egress procedures.
- 2.1.8 Scaffolding equipment limitations and specifications per the manufacturer.
- 2.1.9 Inspection and storage procedures for the equipment.

2.2 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training. Training will be conducted by the Safety Manager or other designated competent person.

2.3 Refresher Training. The training content will be identical to initial training. Refresher training will be conducted on an as needed basis or whenever there is a change in the type of scaffolding equipment used, or when a known hazard is added to the work environment which affects this program.

2.4 Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever M&M ERECTORS has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of scaffolding equipment or procedures.

3. Competent and Qualified Persons.

When working with scaffolds in this company there are some tasks that must be done by our competent or a qualified person. By definition they are:

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

3.2 Qualified Person-One who by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, has successfully demonstrated his/her ability to solve or resolve problems related to the subject matter, the work being performed or the project.

3.3 Competent Person.

3.3.1 We will not intermix scaffold components manufactured by different manufacturers unless the components fit together without force and the scaffold's structural integrity is maintained. Scaffold components manufactured by different manufacturers will not be modified in order to intermix them unless our competent person determines the resulting scaffold is structurally sound.

3.3.2 Before a suspension scaffold is used, direct connections must be evaluated by our competent person who will confirm, based on the evaluation, that the supporting surfaces are capable of supporting the loads to be imposed.

3.3.3 Prior to each work shift and after every occurrence, which could affect a rope's integrity, suspension scaffolds will be inspected by our competent person. Ropes will be replaced if any of the conditions outlined in 1926.451(d)(IO) exist.

3.3.4 Scaffolds will be rejected, moved, dismantled, or altered only under the supervision and direction of a competent person.

3.4 Qualified Person:

3.4.1 Scaffolds must be designed by a qualified person and shall be constructed and loaded in accordance with that design.

3.4.2 Swaged attachments or spliced eyes on wire rope manufacturer or a qualified person.

3.4.3 We will have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards.

4. Falling Object Protection.

All employees must wear hardhats when working on, assembling, or dismantling scaffolds. This is our primary protection from falling objects. Additionally Supervisors will ensure:

4.1 All guardrail systems are installed with openings small enough to prevent passage of potential falling objects.

4.2 Tools, materials, or equipment are prevented from inadvertently falling from scaffolds.

5. Fall Protection.

Our fall protection plan follows OSHA requirements, which depend on the type of scaffold that is used. Unless otherwise specified by the Safety Manager or manufacturer, fall protection will be used by any employee on a scaffold more than 6 feet above a lower level.

5.1 Guardrails must be used with self-contained adjustable scaffolds supported by the frame structure. The guardrail must meet the minimum requirements as identified in the M&M ERECTORS Fall Protection Program.

6. General Procedures.

The following general procedures apply to all scaffold and aerial lift operations for M&M ERECTORS Capacity.

6.1 Taking into account the OSHA rules we must apply and the engineering/manufacturing requirements of our scaffolds, the following rules apply.

6.1.1 Each scaffold and scaffold component we use will support, without failure, its own weight and at least four times the maximum intended load applied or transmitted to it.

6.1.2 When we use non-adjustable suspension scaffolds, each suspension rope, including connecting hardware, will support, without failure, at least six times the maximum intended load applied or transmitted to that rope.

6.2 Gaining Access to Scaffolds. Supervisors will ensure that all employees are provided with safe access to working platforms.

6.2.1.1 Portable, hook-on and attachable ladders will be used and positioned so as not to tip the scaffold.

6.2.1.2 All stair rail system with will be installed according to manufacturer specifications and will be surfaced to

prevent injury to our employees from punctures or lacerations, and to prevent snagging of their clothes.

6.3 Platforms. The following safety rules apply for scaffold platforms:

6.3.1 Each scaffold plank will be installed so that the space between adjacent planks and the space between the platform and uprights is no more than one inch wide.

6.3.2 Scaffold platforms and scaffold components will never be loaded in excess of their maximum intended loads or rated capacities.

6.3.3 All platforms, other than those on outrigger scaffolds or where lathing operations are performed, will be constructed with no more than 14 inches from the face of the work. The only other excerption is when a proper guardrail or personal fall arrest system is used in accordance with the M&M ERECTORS Fall Protection Program. Outrigger scaffolds will have a maximum of 3 inches and plastering and lathing operations will use a maximum of 18 inches from the front edge of work.

6.3.4 Debris must not be allowed to accumulate on platforms.

6.3.5 Supported Scaffolds.

6.3.5.1 Supported scaffolds with a height base width ratio of more than four to one (4:1) must be restrained from tipping by guying, tying, bracing, or equivalent means.

6.3.5.2 Supported scaffold poles, legs, posts, frames, and uprights will always bare on base plates and mudsills or other adequate firm foundations.

6.3.6 Suspension Scaffolds.

6.3.6.1 Before a suspension scaffold is used, all direct connections will be evaluated by the Supervisor or other designated competent person. The competent person will confirm based on the evaluation, which of the supporting surfaces, are capable of supporting the loads that will be imposed.

6.3.6.2 When winding drum hoists are used on a suspension scaffold, they will never contain less than four wraps of the suspension rope at the lowest point of scaffold travel.

7. Specific Procedures.

In addition to the general procedures in this written safety plan, there are procedures that apply to specific types of scaffolds. The safety rules for these

specific types of scaffolds are found in 1926.452.

7.1 Perry Scaffolds. Perry scaffolds are commonly used by M&M ERECTORS employees. The following minimum guidelines provided by the manufacturer will be followed:

7.1.1 Perry scaffolds will not be constructed higher than 18 feet high.

7.1.2 Employees will not be moved while on the Perry scaffold.

7.1.3 Perry scaffolds must be used indoors and on level surfaces. They may be used on limited basis outdoors if the floor surface is flat/level and solid such as concrete pad.

7.1.4 Employees are prohibited from placing a ladder on top of the Perry scaffold.

8. Prohibited Practices. The following practices will never be tolerated in this company:

8.1 Scaffold components manufactured by different manufacturers will never be intermixed unless the components fit together without force and the scaffold's structural integrity is maintained.

8.2 Unstable objects will never be used to support scaffolds or platform units. Footings must be level, sound, rigid, and capable of supporting the loaded scaffold without settling or displacement.

8.3 Cross-braces will never be used as a means of access. .

8.4 The use of shore or lean-to scaffolds is prohibited

9. Aerial Lift Safety.

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

9.1 No employee shall operate any type of lift unless properly trained in the operation and inspection before operation of Aerial Lifts, and the employee must carry proof of training on him at all times while operation of the lift takes place.

9.2 All lifts shall be inspected before each shift to determine that such lift is in safe working condition. Check lift controls for proper functioning, tire pressure (if the lift has inflated tires), make sure the lift has no leaks of any fluids, and make sure the operators manual is on the lift at all times during operation.

9.3 A body harness shall be worn and a lanyard attached to the boom or basket when working from an aerial lift. The point of connection must be constructed to withstand 5000 pounds of its intended weight. Most aerial lifts have this connection built in (check the operator's manual for location of this anchorage point). Do not tie-off to an adjacent pole, structure, or equipment while working from an aerial lift. All employees shall stand firmly on the floor of the basket or platform, and shall not sit or climb on the edge of the basket or use planks, ladders or other devices for a work position. Proper Fall Protection would be a restraint system (2'lanyard).

9.4 Aerial lift trucks shall not be moved when the boom is elevated in a working position with the workers in the basket, except for equipment, which in specifically designed for this type of operation.

9.5 No aerial lift this company uses will be "field modified" for uses other than those intended by the manufacturer unless: (1) the manufacturer certifies the modification in writing, or (2) any other equivalent entity, such as a nationally recognized testing lab, certifies the aerial lift modification conforms to all applicable provisions of ANSI A92.2-1969, and OSHA rules at 1926.453 The lift must be at least as safe as the equipment was before modification.

9.6 Ladder Trucks and Tower Trucks:

9.6.1 Aerial ladders must be secured in the lower traveling position by the locking device on top of the truck cab, and the manually operated device at the base of the ladder before the truck is moved for highway travel.

10. Inspections.

Site preparation, scaffold erection, fall protection, and gaining access to the working platform are only part of the requirements for scaffold work. The Supervisor or other designated competent person will inspect all scaffolds and scaffold components for visible defects before each work shift, and after any occurrence, which could affect a scaffold's structural integrity.

SUBJECT: Welding and Cutting Safety Program

REGULATORY STANDARDS: OSHA 29 CFR 1910.251 – 252
OSHA 29 CFR 1926 Subpart J

GENERAL: M&M ERECTORS will ensure that the hazards associated with welding and cutting operations at our jobsites are evaluated, and that information concerning these hazards is transmitted to all employees.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received the training before being allowed to perform welding or cutting operations. Subcontractors are required to provide written documentation of welding and cutting operations that meet or exceed these requirements.

Contents of the Welding and Cutting Safety Program

WELDING AND CUTTING SAFETY PROGRAM

1. Written Program.

These written Welding & Cutting Procedures establish guidelines to be followed whenever employees of M&M ERECTORS perform any welding or cutting operations. Subcontractors performing welding and cutting operations must have written documentation that meets or exceeds these requirements. M&M ERECTORS will review and evaluate this program on an annual basis, when changes occur to the regulations, when operational changes occur that require a revision of this document, when there is an accident or near miss that relates to this area of safety, or any time these procedures fail.

2. Training.

It is the policy of M&M ERECTORS to permit only trained and authorized personnel to operate welding and cutting equipment. Subcontractors will be responsible for training their employees.

2.1 Instructors will have the necessary knowledge, training, and experience to train new welding and cutting equipment operators.

2.2 Initial Training. All welders and cutter must be trained and tested on the equipment they will be operating before they begin their job. Training must cover the operational hazards of welding and cutting operations, including:

- 2.2.1 Hazards associated with the particular make and model of the welding and cutting equipment;
- 2.2.2 Hazards of the workplace; and
- 2.2.3 General hazards that apply to the operation of all or most welding and cutting equipment.

2.3 Each potential welder or cutter who has received training in any of the elements for the types of equipment which that employee will be authorized to operate need not be retrained in those elements before initial assignment in our workplace. The Safety Manager of M&M ERECTORS will obtain has written documentation of the training and Supervisors will ensure that the employee is evaluated to be competent.

2.4 After an employee has completed the training program, the instructor will determine whether the potential welder or cutter can safely perform the job. At that point, the trainee will take a performance test or practical exercise through which the instructor(s) will decide if the training has been adequate. All welding and cutting trainees will be tested on the equipment they will be operating.

2.5 Certification. M&M ERECTORS will certify that employee training has been

accomplished and is being kept up to date. The certification will contain each employee's name and dates of training.

2.6 Retraining. The training content will be identical to initial training. Refresher training will be conducted on an annual basis. Retraining will occur when the following conditions are met, whichever event occurs sooner.

2.6.1 Retraining will be provided for all authorized and affected employees whenever (and prior to) a change in their job assignments, a change in the type of fall protection equipment used, or when a known hazard is added to the work environment which affects the fall protection program.

2.6.2 Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever M&M ERECTORS has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of fall protection equipment or procedures.

3. Fire prevention and protection.

Fire and explosion pose a serious risk to our employees during welding, cutting, and brazing operations. Sparks can travel as much as 35 feet, and spatter can bounce on the floor or fall through openings creating hazards in other work areas of our facility.

3.1 Basic safety precautions. Cutting or welding will be permitted only in areas that are or have been made fire safe. When work cannot be moved practically, as in most construction work, the area will be made safe by removing combustibles or protecting combustibles from ignition sources. The below listed basic safety precautions will be followed by company employee's performing welding, cutting, and brazing operations. The basic precautions for fire prevention in welding or cutting work are:

3.1.1 Fire hazards. If the object to be welded or cut cannot readily be moved, all movable fire hazards in the vicinity will be taken to a safe place.

3.1.2 Guards. If the object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards will be used to confine the heat, sparks, and slag, and to protect the immovable fire hazards.

3.1.3 Fire extinguishers. Suitable fire extinguishing equipment will be maintained in a state of readiness for instant use. Such equipment may consist of pails of water, buckets of sand, hose or portable extinguishers depending upon the nature and quantity of the combustible material exposed.

3.1.4 Combustible material. Wherever there are floor openings or cracks

in the flooring that cannot be closed, precautions will be taken so that no readily combustible materials on the floor below will be exposed to sparks whom might drop through the floor. The same precautions will be observed with regard to cracks or holes in walls, open doorways and open or broken windows.

3.1.5 Fire watch. Firewatchers will be required as indicated by the Safety Manager. Firewatchers will have fire-extinguishing equipment readily available and be trained in its use. They will be familiar with facilities for sounding an alarm in the event of a fire. They will watch for fires in all exposed areas, try to extinguish them only when obviously within the capacity of the equipment available, or otherwise sound the alarm. A fire watch will be maintained for at least a half-hour after completion of welding or cutting operations to detect and extinguish possible smoldering fires.

3.1.6 Authorization. Employees performing welding and cutting operations must obtain authorization from their Supervisor. Where required, employees will fill out a Hot Work permit.

3.1.7 Prohibited areas. Cutting or welding will not be permitted in the following situations:

3.1.7.1 In areas not authorized by management.

3.1.7.2 In the presence of explosive atmospheres (mixtures of flammable gases, vapors, liquids, or dusts with air), or explosive atmospheres that may develop inside uncleaned or improperly prepared tanks or equipment which have previously contained such materials, or that may develop in areas with an accumulation of combustible dusts.

3.1.7.3 In areas near the storage of large quantities of exposed, readily ignitable materials such as flammable liquids, baled paper, or cotton.

3.1.8 Relocation of combustibles. Where practicable, all combustibles will be relocated at least 35 feet (10.7 m) from the work site. Where relocation is impracticable, combustibles will be protected with flameproofed covers or otherwise shielded with guards or curtains.

3.1.9 Combustible walls. Where cutting or welding is done near walls, partitions, ceiling or roof of combustible construction, fire-resistant shields or guards will be provided to prevent ignition.

4. Operating Procedures.

All employees have a general obligation to work safely with and around welding and cutting operations. Welding and cutting can create certain hazards that only safe work practices can prevent. Subcontractors must supply M&M ERECTORS with their operating procedures before work begins.

5. Handling Cylinders.

The following minimum requirements must be followed when handling cylinders:

5.1 Valve protection caps will be in place and secured.

5.2 When cylinders are hoisted, they will be secured on a cradle, slingboard, or pallet. They will not be hoisted or transported by means of magnets or choker slings.

5.3 Cylinders will be moved by tilting and rolling them on their bottom edges. They will not be intentionally dropped, struck, or permitted to strike each other violently.

5.4 When cylinders are transported by powered vehicles, they will be secured in a vertical position.

5.5 Valve protection caps will not be used for lifting cylinders from one vertical position to another.

5.6 Unless cylinders are firmly secured on a special carrier intended for this purpose, regulators will be removed and valve protection caps put in place before cylinders are moved.

5.7 A suitable cylinder truck, chain, or other steadying device will be used to keep cylinders from being knocked over while in use.

5.8 When work is finished, when cylinders are empty, or when cylinders are moved at any time, the cylinder valve will be closed.

5.9 Compressed gas cylinders will be secured in an upright position at all times except, if necessary, for short periods of time while cylinders are actually being hoisted or carried.

5.10 Oxygen cylinders in storage will be separated from fuel-gas cylinders or combustible materials (especially oil or grease), a minimum distance of 20 feet (6.1 m) or by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one-half hour.

5.11 Inside of buildings, cylinders will be stored in a well-protected, well-

ventilated, dry location, at least 20 feet (6.1 m) from highly combustible materials such as oil or excelsior. Cylinders should be stored in definitely assigned places away from elevators, stairs, or gangways. Assigned storage places will be located where cylinders will not be knocked over or damaged by passing or falling objects, or subject to tampering by unauthorized persons. Cylinders will not be kept in unventilated enclosures such as lockers and cupboards.

6. Inspections.

The Safety Manager, Supervisor, or designated employee will conduct an inspection of all equipment and the area. Inspections will be documented on the Hot Work (Welding and Cutting) Safety form

7. Maintenance.

Any deficiencies found in welding and cutting equipment must be repaired, or defective parts replaced, before continued use. However, modifications or additions that affect the capacity or safe operation of the equipment may not be made without the manufacturer's written approval. If such modifications or changes are made, the capacity, operation, and maintenance instruction plates, tags, or decals must be changed accordingly. In no case may the original safety factor of the equipment be reduced.

8. Signs and Labels.

Signs and labels must be posted in plain view when welding or cutting operations are being performed.

SUBJECT: Equipment, Tools, and Ground Fault Safety Program

REGULATORY STANDARD: OSHA 29 CFR 1926 Subpart I, 1926.404 and
OSHA 29 CFR 1910 Subparts O and P

GENERAL: M&M ERECTORS will ensure that hazards associated with tools and other cord and plug operated electrical equipment are evaluated. This program is intended to address the issues of evaluating and identifying tool selection and use deficiencies, evaluating the associated potential hazards, communicating information concerning these hazards, minimizing the possibility of injury or harm, and establishing appropriate procedures and protective measures for employees.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of the company owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of the company where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received the proper training for the specific equipment and tools necessary for each job assignment.

Contents of the Assured Equipment Grounding Program

EQUIPMENT, TOOLS, AND GROUND FAULT SAFETY PROGRAM

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations or when operational changes occur that require a revision of this document.

2. Training Requirements.

Training will be conducted prior to job assignment. M&M ERECTORS will provide training to ensure that the grounding requirements, purpose, function, and proper use of equipment and tools to be used in the normal function of their jobs is understood by employees. This program will be provided to, and read by all employees receiving training.

2.1 General. Under no circumstances will an employee operate a piece of machinery or equipment until they have successfully completed training. This includes all new operators or users of machinery and equipment, regardless of claimed previous experience.

2.2 Training Content.

2.2.1 Grounding requirements for tools and associated site electrical equipment.

2.2.2 Types of equipment and tools appropriate for use.

2.2.3 Recognition of applicable electrical hazards associated with work to be completed.

2.2.4 Procedures for removal of equipment and/or tools from service.

2.2.5 Basic maintenance for equipment and tools.

2.3 Supervisors. Supervisors will identify all new employees in the employee orientation program and make arrangements with department management to schedule the classroom instruction for those employees identified as needing training. Supervisors will be trained by the Safety Manager to ensure they are capable of communicating the necessary safety information to employees.

2.4 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training.

2.5 Refresher Training. The training content will be identical to initial training. Refresher training will be conducted on as required basis or when the following conditions are met, whichever event occurs sooner.

2.5.1 Retraining will be provided for all authorized and affected

employees whenever (and prior to) there being a change in their job assignments, a change in the type of tools used, or when a known hazard is added to the work environment.

2.5.2 Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever M&M ERECTORS has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of tools.

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

3. General Requirements.

M&M ERECTORS is responsible for the safe condition of tools and equipment used by its employees. Tools and equipment that may be furnished by employees must be approved for use by Supervisors and will be included under this program. Supervisors will ensure that equipment utilized at each job site is maintained in a safe condition.

3.1 Employees will not remove guards, ground pins, or other safety devices from equipment, tools or machinery.

3.2 Defective tools or equipment must be reported and tagged out with ‘’ Do Not Operate tag or turned into the Supervisor to get it replaced.

3.3 All tools and equipment will be operated in accordance with the specific safety rules and manufacturer’s specifications.

3.4 Compliance with the guidelines of this program is mandatory and failure to comply with them will result in disciplinary action, up to and including discharge.

4. Ground Fault Protection.

The following precautions will be taken by employees of this company to prevent injuries resulting from electrical equipment or tools.

4.1 Each supervisor will use **ground fault circuit interrupters (GFCI)** as the primary means of protection for employees from electrical (ground fault) hazards.

4.1.1 GFCI’s. GFCI’s will be used on all extension cords and portable tools. GFCI’s will be installed at the outlet before inserting the tool or extension cord. All employees using GFCI’s must test them prior to use.

4.1.2 Faulty GFCI’s must be turned into the Supervisor or Safety

Manager for replacement.

4.2 The Safety Manger will be responsible to ensure that supervisors are informed if the use of assured *equipment grounding conductor program* in addition to GFCI's will be required on any project. In the event that an assured equipment grounding program is necessary the following guidelines will be followed:

4.2.1 Tests to perform.

4.2.1.1 Tested for continuity and shall be electrically continuous.

4.2.1.2 Each receptacle and attachment cap or plug tested for correct attachment of the grounding conductor.

4.2.1.3 Intervals. All required tests would be performed at a minimum of every 3 months.

4.2.1.4 Color Coding. A system of color-coding will be used on all equipment tested to ensure tests have been performed. The color coding will be as follows:

Month Tested	**Tape Color**
January- March	White
April- June	Green
July- September	Red
October- December	Orange
Repairs	Brown

5. Equipment/Tool Selection.

Supervisors will consider the following when selecting tools for use by employees:

5.1 Is the tool correct for the type work to be performed?

5.2 Is the grounding terminal present on the plug or is the tool double insulated?

5.3 Are grounding terminals or grounding-type devices plugs defeated in any way?

5.4 Are conductors used as a grounded conductor identifiable and distinguishable from all other conductors?

5.5 Is each extension cord set and equipment connected by cord and plug visually inspected daily before use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal

damage?

5.6 Is equipment found damaged or defective removed from service until repaired or replaced?

5.7 Are guards installed properly and in good condition?

6. Equipment/Tool Precautions.

The following precautions will be taken by employees of this company to prevent injury:

6.1 Power tools will always be operated within their design limitations.

6.2 Proper PPE must be worn (safety glasses, gloves, etc.) when in operation.

6.3 Tools will be stored in an appropriate dry location when not in use.

6.4 Tool work will only be conducted in well-illuminated locations.

6.5 Tools will not be carried by the cord or hose.

6.6 Cords or hoses will not be yanked to disconnect it from the receptacle.

6.7 Cords and hoses will be kept away from heat, oils, and sharp edges or any other source that could result in damage.

6.8 Tools will be disconnected when not in use, before servicing, and when changing accessories such as blades, bits and cutters.

6.9 Observers will be kept at a safe distance at all times from the work area.

6.10 Work will be secured with clamps or a vice where possible to free both hands to operate tools.

6.11 To prevent accidental starting, employees should be continually aware not to hold the start button while carrying a plugged-in tool.

6.12 Tools will be maintained in a clean manner, and properly maintained in accordance with the manufacturer guidelines.

6.13 Ensure that proper shoes are worn and that the work area is kept clean to maintain proper footing and good balance.

6.14 Ensure that proper apparel is worn. Loose clothing, ties, or jewelry can become caught in moving parts.

6.15 Tools that are damaged will be removed from service immediately and tagged "Do Not Use". They will be reported and turned over to the Supervisor or Safety Manager for repair or replacement.

6.16 All cracked saws will be removed from service.

7. Inspections and Recordkeeping.

7.1 Machinery, tools, and equipment will be inspected regularly to insure safety and serviceability. Supervisors inspect all machinery, equipment, cords, and accessories before every use.

7.2 Supervisors will also maintain records of inspections of machinery, tools, and equipment. Records will be kept in the management office. The Safety Manager will maintain records in employee safety files of individuals trained and certified for equipment and tools.

SUBJECT: Lockout/Tagout Program

REGULATORY STANDARD: OSHA - 29 CFR 1910.147, 1926.417

GENERAL: M&M ERECTORS will ensure that all machinery and tasks meeting the criteria for lockout/tagout within our facility or jobsites are evaluated. This program is intended to address the issues of evaluating and identifying potential uncontrolled energy sources, evaluating the associated potential hazards, communicating information concerning these hazards, and establishing appropriate procedures, and protective measures for employees. M&M ERECTORS has not designated any qualified or authorized employees to perform Lockout/Tagout. In the event that individual employees are required to perform lockout/tagout or be involved in an operation where lockout/tagout is being performed the following guidelines will be followed.

RESPONSIBILITY: Effective implementation of this program requires support from all levels of management within this company. The Safety Manager is the program coordinator, acting as the representative of the company owners, who have the ultimate responsibility for all facets of this program. The Safety Manager has full authority to make necessary decisions to ensure success of the program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of the company where there is danger of serious personal injury.

Contents of the Lockout/Tagout Program

LOCKOUT/TAGOUT PROGRAM

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations, when operational changes occur that require a revision of this document, when there is an accident or near miss that relates to this area of safety, or any time lockout/tagout procedures fail. Copies of the Program will be available to employees during all work shifts.

1.1 Purpose and Scope. The purpose of this program is to provide guidelines and procedures for isolating all forms of energy from any source, to prevent unexpected energizing or startup of equipment or release of stored energy, which can cause injury. This document addresses the control of hazardous energy program and "lockout/tagout" procedures for M&M ERECTORS.

1.1.1 All M&M ERECTORS employees or contractor personnel are required to comply with the restrictions and limitations of this lockout/tagout program. Attempting to start, energize, or use equipment that is locked out/tagged out is prohibited.

2. Training and Communication

Affected employees will receive training to ensure that they are aware of the hazards associated with equipment that is locked out and tagged. Authorized employees will receive training that provides them the knowledge and skills they need to safely use and remove energy controls.

2.1 Training Content. The following training elements will be presented:

2.1.1 Recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.

2.1.2 The purpose and use of the M&M ERECTORS Lockout/Tagout Program and energy control procedures.

2.1.3 All employees whose work operations are in an area where energy control procedures may be utilized, are instructed about the procedure, and about the prohibition relating to attempts to restart or re-energize machines or equipment which are locked out and tagged.

2.1.4 The importance of lockout tags being legible and securely attached to be effective.

2.2 Employee Retraining

2.2.1 Retraining is provided for all authorized and affected employees

whenever there is a change in their job assignments, or a change in procedures.

2.2.2 Additional retraining is conducted whenever a periodic inspection reveals, or whenever there is a reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

2.3 Certification. Certification of employee training and re-training will be documented and kept current. The certification will contain each employee's name, date of training, and instructor signature and be maintained in the training file. Certification of authorized employees may include the issuance of a personal lock and key.

3. Specific Responsibilities

3.1 Affected employees. Employees whose job requires them to operate or use equipment on which servicing or maintenance is being performed under lockout/tagout, or whose job requires them to work in an area where such servicing or maintenance is being performed, are responsible to:

3.1.1 Remember the purpose of lockout/tagout.

3.1.2 Recognize the identified and possible hazardous energy sources in their work area.

3.1.3 Comply with all requirements of the M&M ERECTORS Lockout/Tagout program.

3.1.4 Not attempt to start or energize equipment or systems that are locked out and tagged out.

3.2 Authorized Employees. M&M ERECTORS has not designated any qualified or authorized employees to perform Lockout/Tagout. In the event that individual employees are required to perform lockout/tagout or be involved in an operation where lockout/tagout is being performed the following guidelines will be followed. Designated Foremen, Supervisors, and other designated employees will receive the training necessary to ensure they have the skills required to safely implement lockout/tagout on equipment. These Authorized Employees are responsible to:

3.2.1 Understand that Tag Only systems are to be utilized only with extreme caution and must provide the same level of protection as locks.

3.2.2 Perform lockout/tagout procedure in accordance with this Program.

3.2.3 Coordinate with other authorized employees when using the procedures during multiple shifts and group lockouts (See Section 6)

3.2.4 Refer to equipment specifications to identify the type and magnitude of the energy that the machine or equipment utilizes in order to understand the hazards and control methods associated with the energy.

3.2.5 Perform periodic inspections of the lockout/tagout procedures in use.

3.2.6 Maintain any assigned individual locks, tags, and lockout devices issued and return the locks, tags, and lockout devices to the Safety Director or supervisor upon completion of the work.

3.3 Supervisors. Supervisors must do the following:

3.3.1 Be familiar with the contents of this program as well as other specific guidelines provided by host employers or prime contractors.

3.3.2 Ensure that Lockout/Tagout Procedures are followed by all employees performing tasks, which fall under the guidelines of this program.

3.3.3 Ensure that all employees performing Lockout/Tagout have been trained and have proof of training before allowing them to perform Lockout/Tagout operations.

3.4 Safety Manager. The Safety Director is ultimately responsible to:

3.4.1 Ensure that all M&M ERECTORS personnel are aware of and understand the purpose of the Lockout/Tagout program.

3.4.2 Ensure that all personnel receive the appropriate training to protect them from the unexpected release of hazardous energy.

4. Energy Control (Lockout/Tagout) procedures

Work performed on any equipment requiring lockout/tagout procedures requires a written energy control procedure (lockout/tagout procedure). An authorized employee must establish the energy control procedure prior to conducting lockout/tagout for a task. The energy control procedure must be documented on a blank Energy Control Procedure form or other similar form. If necessary, the energy control procedure form can be modified to meet any special requirements for a specific task, however the completed procedure will include no less than the following information:

4.1 A specific statement of the intend use of the procedure;

4.2 Necessary steps for shutting down, isolating, blocking, and securing the equipment to control hazardous energy.

4.3 Necessary steps for the placement, removal, and transfer of lockout devices

and associated tags and the person responsible for these devices; and

4.4 Necessary requirements for testing the equipment to determine and verify the effectiveness of the lockout and tag, and other energy control measures.

5. Lockout/Tagout Steps.

This procedure establishes the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is done on machines or equipment. Use these guidelines to ensure that the equipment is stopped, isolated from all potentially hazardous energy sources, and locked out before any employees perform any servicing or maintenance where the unexpected start-up of the equipment or release of stored energy could cause injury. Refer to Appendix A for a blank Energy Control Procedure forms when conducting Lockout/Tagout.

5.1 Lockout/Tagout Steps

5.1.1 Notify all affected employees that servicing or maintenance is required on a machine or equipment and that the equipment must be shut down and locked out to perform the activity.

5.1.2 Determine the type and magnitude of the energy used by the equipment, understand the hazards of the energy, and know the methods to control the energy

5.1.3 If the machine or equipment is operating, shut it down by the normal stopping procedure (depress the stop button, open switch, close valve, etc.).

5.1.4 Apply the energy isolating device(s).

5.1.5 Lockout and tag the energy isolating device(s) with assigned lock(s) and tag(s).

5.1.6 Dissipate or restrain stored or residual energy (such as that in capacitors, springs, hydraulic systems, and air, gas, steam, or water pressure) by methods such as grounding, repositioning, blocking, or bleeding down.

5.1.7 Ensure that the equipment is disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the equipment by operating the control, or by testing to make certain the equipment will not operate.

5.2 Restoring Equipment to Service. When the servicing or maintenance is completed and the machine or equipment is ready to return to normal operating condition, the following steps will be taken:

5.2.1 Check the machine or equipment and the immediate area around the machine to ensure that nonessential items have been removed and that the equipment components are operationally intact.

5.2.2 Check the work area to ensure that all employees have been safely positioned or removed from the area.

5.2.3 Verify that the controls are in neutral, if applicable.

5.2.4 Remove the lockout devices and re-energize the machine or equipment.

5.2.5 Notify affected employees that the servicing or maintenance is completed and the machine or equipment is ready for use.

6. Group Lockout/Tagout Procedures.

Whenever feasible, group lockout/tagout procedures will require that each individual affix their assigned lock to the energy-isolating device. However, when this is not possible due to a large group or the design or location of the energy-isolating device then a group lockout/tagout procedure containing the following will be used:

6.1 One authorized employee designated by the appropriate supervisor with the primary responsibility for a defined number of other personnel working under the protection of a group lockout and tag.

6.2 A checklist with the name of all employees in the group and each individuals signature on the list identifying their presence before application of the lock and tag to the equipment. In addition, after the lockout work is completed and before removal of the group lock and tag from the equipment the responsible authorized employee will verify the presence of each individual in the group and each individual's signature on the checklist.

7. Lockout/Tagout during Shift or Personnel Changes.

If a personnel or shift change is necessary, the following steps will ensure that the change occurs in an orderly fashion and that employee protection is maintained:

7.1 In the event of a personnel change, the arriving authorized employee's lock and tag will be applied before the departing authorized employee's lock and tag are removed.

7.2 In the event of a shift change, the lock and tag of at least one authorized employee on the arriving shift will be applied before any locks and tags of the departing shift are removed. The departing crew will inform the arriving crew of the status of the equipment and the work in progress. In the event that an employee has left the site without removing their lock and tag then the checklist found in Appendix B will be used before the individuals lock is cut and removed.

8. Tagout Only Procedures

Whenever feasible energy control procedures or lockout/tagout will be performed using both an energy-isolating device with a lock affixed to it as well as an

identifying tag. However, when this is not possible due to the design or location of the equipment a Tagout Only procedure will be used. All attempts will be made to avoid the use of a Tag Out only procedure. If a Tagout Only procedure is required *Full Employee Protection* must be provided.

8.1 Full employee protection will be demonstrated by attaching the tagout device to the same location that the lockout device would have been attached and taking additional measures to ensure that the employee is working at a level of safety equivalent to that of using a lockout/tagout procedure. Additional safety measures include but are not limited to the following:

8.1.1 Removal of an isolating circuit element.

8.1.2 Blocking of a controlling switch.

8.1.3 Opening of an extra disconnecting device.

8.1.4 Removal of valve handles to reduce the likelihood of inadvertent energization.

9. Definitions

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

Authorized employee. A person who locks outs or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under this section.

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 of a circuit can be disconnected from all ungrounded supply conductors, and, in addition, 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 energy isolating devices.

Energy source. Any source of electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.

Hot tap. A procedure used in the repair, maintenance and services activities, which involve welding on a piece of equipment (pipelines, vessels or tanks) under pressure, in order to install connections or appurtenances. It is commonly used to replace or add sections of pipeline without the interruption of service for air, gas, water, steam, and petrochemical distribution systems.

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 a lock, either key or combination type, 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 production operations. The utilization of a machine or equipment to perform its intended production function.

Servicing and/or maintenance. Workplace activities such as constructing, installing, setting up, adjusting, inspecting, modifying, and maintaining and/or servicing machines or equipment. These activities include lubrication, cleaning or unjamming of machines or equipment and making adjustments or tool changes, where the employee may be exposed to the unexpected energization or startup of the equipment or release of hazardous energy.
Setting up. Any work performed to prepare a machine or equipment to perform its normal production 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. (Example)

- Locks & Tags - identified to the worker
- Hasps - for placing locks & tags
- Breaker Clips - for electrical LOTO

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 the tagout device is removed.

SUBJECT: Electrical Safety (Hot Work) Program

REGULATORY STANDARDS: OSHA 29 CFR 1910.331-335
OSHA 29 CFR 1926 Subpart K

GENERAL: M&M ERECTORS will ensure that work practices performed on or in proximity to energized electrical equipment are evaluated to determine if proper safety precautions are instituted. This program is intended to address the issues of evaluating and identifying potential energy sources where work is performed, evaluating the associated potential hazards, communicating information concerning these hazards, and establishing appropriate procedures, and protective measures for our employees. Issues that relate to the use of portable electrical tools, extension cords, or GFCI's are addressed in the M&M ERECTORS Equipment, Tools, and Ground Fault Safety Program.

M&M ERECTORS has not designated any qualified or authorized employees to perform work on exposed energized electrical equipment. In the event that individual employees are required to perform work on energized electrical equipment be involved in an operation where electrical hot work is being performed the following guidelines will be followed.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received the basic electrical safety training before working in any areas electrical hazards exist. Subcontractors will be required to provide a written Electrical Safety or Electrical Hot Work Program, which describes the subcontractor's policies and procedures when they will be working in or around energized electrical equipment.

Contents of the Electrical Safety (Hot Work) Program

ELECTRICAL SAFETY (HOT WORK) PROGRAM

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, or when changes occur to the regulations or when operational changes occur that require a revision of this document. This written program will be communicated to all personnel that are affected by it.

1.1 General Requirement. This program will cover work by unqualified persons. M&M ERECTORS has not designated any qualified or authorized employees that individual employees are required to perform work on energized electrical equipment be involved in an operation where electrical hot work is being performed. The Safety Manager will amend this program to address provisions of 29 CFR 1910.331 through 1910.335 and 1926 Subpart K. Subcontractors will be expected to adhere to these requirements and will ensure the following components, at a minimum, are addressed in their electrical safety or electrical hot work program:

1.2 Job or Task Evaluation.

1.2.1 Electrical Hot Work Permits.

1.2.2 Safeguards for Personnel Protection.

1.2.3 Selection and Use of Safe Work Practices.

1.2.4 All applicable OSHA Regulations related to the specific work.

2. Training Requirements.

At a minimum, all employees of M&M ERECTORS will receive basic awareness training, which describes the hazards of electricity and importance of reporting those hazards to their Supervisors

2.1 Contractor personnel. Sub-Contractors of M&M ERECTORS will be required to provide documentation of training for all personnel performing electrical hot work.

2.2 Content of training.

2.2.1 Employee job specific training (unqualified). Employees who are classified as “Unqualified Persons” (i.e., those not permitted to work on or near exposed energized parts) will also be trained in and become familiar with any related safety practices related to their jobs accordance with this program and the M&M ERECTORS Equipment, Tool, and Ground Fault Safety Program.

2.2.2 Certification. M&M ERECTORS will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee’s name and dates of training.

3. Jobsite/Work Area Evaluation.

Supervisors will evaluate each jobsite or work area to determine where risk from electrical hazards exists.

3.1 When evaluating the fall hazards of jobsites or work areas for electrical hazards Supervisors must consider the following:

3.1.1 Must the work be performed on exposed energized parts?

3.1.2 Must the work be performed where exposed energized parts are located?

3.1.3 Are all electrical panels or electrically energized parts properly guarded or covered?

3.1.4 Are employees trained and familiar with the M&M ERECTORS Equipment, Tool, and Ground Fault Safety program?

3.1.5 Are other contractors or subcontractors performing electrical hot work in the immediate are and are proper notification procedures being followed? (See Employee Notification)

4. Employee Notification.

Supervisors must ensure that employees are notified and protected from electrical hazards either by using one of the methods below or by any other equally effective means:

4.1 Safety signs and tags. Safety signs, safety symbols, or accident prevention tags will be used where necessary to warn employees about electrical hazards that may endanger them. A sign used for untrained employee/visitor notification must read, “DANGER ELECTRICAL HAZARD, AUTHORIZED PERSONNEL ONLY” or similar language in accordance with 29 CFR 1910.145.

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

4.3 If signs and barricades do not provide sufficient warning and protection from electrical hazards, an attendant will be stationed to warn and protect employees.

5. Safe Work Practices.

Supervisors will ensure use the following safety-related work practices to prevent electric shock or injuries. This will be done whenever work is performed near or on equipment or circuits that are or may be energized. The specific safety-related work practices will be consistent with the nature and extent of the associated electrical hazards.

5.1 Deenergized parts. Live parts to which an employee may be exposed will be deenergized before the employee works on or near them.

5.2 Lockout/Tagout. While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits that energized the parts will be locked out or tagged or both in accordance with the requirements of M&M ERECTORS lockout/tagout procedures program.

5.3 Overhead lines. If work is to be performed near overhead lines, the lines will be deenergized and grounded, or other protective measures will be provided before work is started. If the lines are to be deenergized, arrangements will be made with the person or organization that operates or controls the electric circuits involved to deenergized and ground them. If protective measures, such as guarding, isolating, or insulating are provided, these precautions will prevent employees from coming in direct contact with such lines with any part of their body or indirectly through conductive materials, tools, or equipment.

5.3.1 When an unqualified employee is working in an elevated position near overhead lines, the location will 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:

5.3.2 For voltages to ground 50kV—10ft. (305 cm)

5.3.3 For voltages to ground over 50kV—10ft (305 cm) plus 4 in. (10 cm) for every 10kV over 50kV.

5.4 Interlocks. M&M ERECTORS employees may not defeat electrical safety interlocks for any reason.

SUBJECT: Fire Protection Safety Program

REGULATORY STANDARDS: OSHA 29 CFR 1910.155
OSHA 29 CFR 1926 Subpart F

GENERAL: M&M ERECTORS will apply to the placement, use, maintenance, and testing of portable fire extinguishers provided for the use of employees. This section provides guidelines for the protection of personnel from fires and the prevention of fires. This procedure applies to all company divisions, on-site construction and maintenance projects.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of a potential fire. Supervisors are required to ensure their employees are aware of the contents of this program and have received fire prevention & protection safety training. Subcontractors are required to follow the fire prevention & protection guidelines.

Contents of the Fire Protection Safety Program

FIRE PROTECTION SAFETY PROGRAM

1. Written Program.

The Fire Protection Procedures will apply to the placement, use, maintenance, and testing of portable fire extinguishers provided for the use of employees. The Fire Protection Procedures establish guidelines to follow when employees of M&M ERECTORS perform any hot work. M&M ERECTORS will review and evaluate this program on an annual basis, when changes occur to the regulations, when operational changes occur that require a revision of this document, when there is an accident or near miss that relates to this area of safety, or any time these procedures fail.

2. Training.

It is the policy of M&M ERECTORS to train personnel in the fire protection procedures. Subcontractors will be responsible for training their employees.

2.1 Initial Training. The company will accomplish fire protection and fire extinguisher training for all new employees. All employees will be informed of fire behavior, the classes and types of fire, and will be instructed on the safe use of fire extinguishers. All employees will attend additional training, as appropriate.

2.2 Retraining. The training content will be identical to initial training. Refresher training will be conducted on an annual basis. Retraining will occur when the following conditions are met, whichever event occurs sooner.

2.2.1 Retraining will be provided for all employees whenever (and prior to) a change in their job assignments, work environment or a known hazard is added to the work environment which affects the fire protection program.

2.2.2 Additional retraining will also be conducted whenever a periodic inspection reveals, or whenever M&M ERECTORS has reason to believe, that there are deviations from or inadequacies in the employee's knowledge of the fire prevention & protection procedures.

3. Fire Protection.

- Good house keeping and fire prevention go hand-in-hand for obvious reasons, not only on your job site but in the home and office, as well. Fires can start anywhere at any time and this is why it is important to know how to use a fire extinguisher and which fire extinguisher to use on different types of fire.

- The fact that fire extinguishers are our first line of defense in the event of a fire should warrant a periodic and complete inspection. Fire extinguishers must be kept clean to attract attention, they must be kept accessible to eliminate lost time when

needed, and the rubber hose, horn or other dispensing component must be checked to assure against blockage. Also know where and how to activate the fire alarm and sprinkling systems.

- An alarm system will be established for notification of all employees at the site of an emergency. The alarm system should include lights, horns, sirens, or other appropriate devices to ensure that every employee is aware of shop/project emergencies.

- To prevent ignition hazards, electrical wiring and equipment will be installed in accordance with the National Electrical Code and National Fire Protection Association (NFPA) Code 70. Smoking will be prohibited in areas where fire hazards may exist, and "No Smoking" signs will be posted.

- General Industry- A portable fire extinguisher shall be provided for a **Class A** hazard so that the travel distance for employees is to any extinguisher is 75 ft. or less. A portable fire extinguisher shall be provided for a **Class B** hazard so that the travel distance for employees is to any extinguisher is 50 ft. or less. A portable fire extinguisher shall be provided for a **Class C** hazard on the basis of the appropriate pattern for the existing **Class A** or **Class B** hazards. A portable fire extinguisher shall be provided for a **Class D** hazard so that the travel distance from the combustible metal working area to any fire extinguishing agent for employees is to any extinguisher is 75 ft. or less.

- Construction- A portable fire extinguisher rated not less than 2A will be provided for each 3,000 square feet of building area and in each yard storage area. Travel distance to any fire extinguisher will not exceed 100 feet from any protected area.

- One or more extinguishers rated not less than 2A will be located on each floor of a multi-storied building. At least one 2A-rated extinguisher will be located adjacent to a stairway in a multi-storied building. Extinguishers rated not less than 10B will be provided between 25 feet and 75 feet of any area in which more than 5 gallons of flammable or combustible liquids or 5 pounds of flammable gas are being used or stored. Note: This does not apply to fuel tanks of motor vehicles.

- Extinguishers will be conspicuously located where they will be readily accessible and immediately available in case of a fire, and their locations will be conspicuously marked. Extinguishers will be installed on hangers or in the brackets provided. Those extinguishers are not more then 5 feet from the floor. Those extinguishers weighing more than 40 pounds will be installed so the top is not more than 3 feet from the floor.

- In the case of an emergency follow the emergency action plan and evacuate the building if necessary.

STORAGE OF FLAMMABLE & COMBUSTIBLE LIQUIDS

- Above ground storage tanks shall have spill containment capable of controlling 110% of capacity of tanks.
- A 20-pound ABC fire extinguisher shall be posted between 25 feet and 75 feet from storage area.

- Storage tanks and container to be filled shall be bonded.

- Storage tanks shall be vented.

- Storage tanks shall have automatic shut off on dispensing hoses.

- Storage tanks shall have impact protection, in some form, from vehicle traffic.

FLAMMABLE LIQUID & COMPRESSED GAS STORAGE

The purpose is to provide guidelines for the safe handling and storage of flammable liquids and compressed gases. This procedure applies to all material storage and handling activities in this company.

PROCEDURE

Petroleum Product Storage

- Petroleum products delivered to the job site and stored there in drums shall be protected during handling to prevent loss of identification through damage to drum markings, tags, etc. Unidentified petroleum products may result in improper use, with possible fire hazard, damage to equipment, or operating failure.

- Bulk delivery and storage of petroleum products requires care in identification and particular attention to fire hazards during handling and storage. Appropriate fire extinguishers must be easily accessible in the immediate storage location. The storage area shall have a dike to prevent the spread of accidentally released material (outside storage of bulk material).

STORAGE OF FLAMMABLE & COMBUSTIBLE LIQUIDS

- Above ground storage tanks shall have spill containment capable of controlling 110% of capacity of tanks.

- All liquids should be considered as flammable unless the label clearly indicates that no such exposure exists.

- Conditions on construction sites change so rapidly that extreme care is necessary whenever flammable liquids are being used. Flammable liquids can be ignited by open flames, sparks, or excessive heat, so it is necessary that each of these factors be considered when setting up safe storage facilities for these items.

- No other equipment or materials should be contained in the area where flammable or combustible liquids are stored.

- All areas that are to be used for the storage of flammable liquids should be conspicuously designated as such, and No Smoking signs posted.

- The “No Smoking” must be vigorously enforced. These areas shall always be located so that local fire protection will always have access to the material.

- Only approved containers can be used for the storage of flammable liquids, and each container must have an emergency-venting device.

- All containers, from which flammable liquids are to be dispensed, shall be grounded, and when transferring flammable liquids, the dispensing container shall be bonded to the receiving container.

- Fire protection should be available no closer than 25 feet but no further than 75 feet of the flammable liquid storage area.

STORAGE OF COMPRESSED GAS CYLINDERS

- Cylinders shall be kept away from radiators and other forms of heat (protected from solar).

- Inside buildings, cylinders shall be stored in a dry, well-ventilated and protected area. Cylinders shall not be stored in unventilated enclosures such as lockers and cupboards.

- Assigned storage spaces shall be located where cylinders will not be knocked over or damaged by passing or falling objects, or be subject to tampering by unauthorized persons.

- Empty cylinders shall have the valves closed. Storage of cylinders shall be separated and identified with content and condition (full or empty).

- When cylinders are not in use the caps shall be in place and the cylinders shall be secured (chained) in an upright position at all times, including when being hoisted or transported.

- Small, hand held compressed gas cylinders used for propane torches, gas detector test cylinders, etc. should be stored in the upright position.

- A 20-pound ABC rated fire extinguisher (minimum) shall be placed no closer than 25 feet, but not further than 75 to a compressed gas storage areas.

- Warning signs shall be conspicuously placed and shall read, “Danger-No Smoking, Matches or Open Lights or Flames," or other equivalent word in a compressed gas storage area.

- Inside buildings, cylinders (except those in actual use or attached for use) shall be limited to a total gas capacity of 2,000 cubic feet or 300 pounds of liquefied petroleum gas.

- Oxygen cylinders in storage shall be separated from fuel-gas cylinders or combustible materials (especially oil or grease) a minimum of 20 feet, or by a noncombustible barrier at least five feet high having a fire-resistant rating of at least one-half (1/2) hour.

- LPG gas cannot be stored inside buildings. LPG gas must be stored in a tamper resistant structure with ventilation and have no open flame or smoking signs posted.

- Storage area shall be at least 25 feet from buildings.

INSPECTIONS

- Extinguishers will be inspected monthly, or more often when circumstances warrant, to ensure that they have not been actuated or tampered with, and to detect any damage. Inspection tags will be placed, and the date of inspection will be indicated after each inspection. Hydro-testing or weighing in accordance with NFPA requirements should be completed.

- Each extinguisher will have a durable tag securely attached to show the maintenance test and recharge date and the initials or signature of the person who performed the services. A discharged fire extinguisher will be removed from service immediately and replaced with equipment protection.

RECHARGING

A plan will be established for the prompt recharging and testing of fire extinguishers in accordance with NFPA standards.

SUBSTITUTIONS

In areas where 2A extinguishers are required, the following may be substituted for each extinguisher:

- One 55-gallon barrel of water with three pails.
- A water hose of not less than ½ inch diameter, of not more than 100 feet in length, and with a discharge capacity of 5 gallons per minute.
- One fire hose of not less than 1 ½ inch diameter, of not more than 100 feet in length, and with a discharge capacity of 25 gallons per minute.

Note: The hose referred to above must be of sufficient length and have a stream range so as to reach all points in the protected area. These substitutions will not apply where the possibility of freezing exists.

4. Maintenance and Inspections.

The Safety Manager, Supervisor, or designated employee will develop a maintenance program which will include periodic inspections of the fire protection equipment.

5. Signs and Labels.

Fire extinguisher stations shall be conspicuously marked with approved Signs and labels. The sign and labels must be posted in plain view at the fire extinguisher station.

SUBJECT: Powered Industrial Truck Safety Program.

REGULATORY STANDARD: OSHA - 29 CFR 1910.178
OSHA - 29 CFR 1926

GENERAL: M&M ERECTORS will ensure that the requirements of the OSHA Standard for powered industrial trucks will be adhered to. This program is intended to address the issues of employee training, authorization, safety requirements, fire protection, maintenance, and general operation of fork trucks, platform lift trucks, and other specialized industrial trucks used within our jobsites.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received training before assignment to work.

Contents Powered Industrial Truck Safety Program

Powered Industrial Truck Safety Program

1. Written Program.

M&M ERECTORS will review and evaluate this program on an annual basis, when changes occur to the regulations, or when operational changes occur that requires a revision of this document.

2. Training Program.

2.1 Operator training. Only trained and authorized operators will be permitted to operate a powered industrial truck. All operator training and evaluations will be conducted by the Safety Manager or designated persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence. Employees will be trained in accordance with the following guidelines.

2.1.1 The company Safety Administrator, individual supervisor, or select trainers, (once trained) will have the authority to provide training on the operation of powered industrial trucks.

2.1.2 Employees of M&M ERECTORS will not operate a powered industrial truck (PIT) unless they have received training in accordance with this program and 29 CFR 1910.178.

2.1.3 Personnel rotated within the company will have their training verified prior to being allowed to operate a PIT.

2.1.4 Employee personnel records will be annotated with the date, title, and specifics of said training.

2.1.5 Any employee who refuses such training will not be permitted to operate a PIT.

2.2 Trainees may operate a powered industrial truck only:

2.2.1 Under the direct supervision of persons who have the knowledge, training, and experience to train operators evaluate their competence; and

2.2.2 Where such operation does not endanger the trainee or other employees.

2.3 Retraining will be provided for all operators:

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

2.3.2 The operator has been observed to operate the vehicle in an unsafe manner;

2.3.3 The operator has been involved in an accident or near-miss incident;

2.3.4 The operator has received an evaluation that reveals that the operator is not operating the truck safely;

2.3.5 The operator is assigned to drive a different type of truck; or

2.3.6 A condition in the workplace changes in a manner that could affect safe operation of the truck.

2.3.7 Every three years.

2.4 Avoidance of duplicative training. If an operator has previously received training in a topic specified in paragraph 29 CFR 1910.178, and such training is appropriate to the truck and working conditions encountered, additional training in that topic is not required if the operator has been evaluated and found competent to operate the truck safely.

2.5 Retraining will reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary.

2.6 Certification. This employer will certify that employee training has been accomplished and is being kept up to date. The certification will contain each employee's name and dates of training and any other information as required.

3. General Requirements.

3.1 Trucks will not be driven up to anyone standing in front of a fixed object.

3.2 No person will be allowed to stand or pass under the elevated portion of any truck, whether loaded or empty.

3.3 Unauthorized personnel will not be permitted to ride on powered industrial trucks. A safe place to ride will be provided where riding of trucks is authorized.

3.4 Arms or legs are prohibited from being placed between the uprights of the mast or outside the running lines of the truck.

3.5 When a powered industrial truck is left unattended, load-engaging means will be fully lowered, controls will be neutralized, power shut off, and brakes set. Wheels will be blocked if the truck is parked on an incline.

3.5.1 A powered industrial truck is unattended when the operator is 25 ft. or more away from the vehicle, which remains in his view, or whenever the operator leaves the vehicle and it is not in his view.

3.5.2 When the operator is dismounted and within 25 ft. of the truck still in his view, the load engaging means will be fully lowered, controls neutralized, and the brakes set to prevent movement.

3.6 A safe distance will be maintained from the edge of ramps or platforms while on any elevated dock, platform, or freight car. Trucks will not be used for opening or closing freight doors.

3.7 Brakes will be set and wheel blocks in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading. Fixed jacks may be necessary to support a semitrailer during loading or unloading when the trailer is not coupled to a tractor. The flooring of trucks, trailers, and railroad cars will be checked for breaks and weakness before they are driven onto.

3.8 The operator will ensure sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc. before operating the vehicle in these areas.

3.9 An overhead guard will be used as protection against falling objects. It should be noted that an overhead guard is intended to offer protection from the impact of small objects representative of the job application, but not to withstand the impact of a falling capacity load.

3.10 Whenever a truck is equipped with vertical only, or vertical and horizontal controls elevatable with the lifting carriage or forks for lifting personnel, the following additional precautions will be taken for the protection of personnel being elevated.

3.10.1 Use of a safety platform firmly secured to the lifting carriage and/or forks.

3.10.2 Means will be provided whereby personnel on the platform can shut off power to the truck.

3.10.3 Such protection from falling objects, as indicated necessary by the operating conditions would be provided.

3.11 Fire aisles, access to stairways, and fire equipment will be not be obstructed at any time.

3.12 Operators:

3.12.1 Will obey Plant/Site speeds and other traffic regulations at all times.

3.12.2 Will operate loaded trucks with forks no more than 6-8 inches above the ground, with the load carried low and tilted back.

3.12.3 Will not raise or lower loads while moving.

3.12.4 Will not carry anything on the overhead guard.

3.12.5 Will use all plant/Site observation mirrors

3.12.6 Will ensure vehicle sound/illuminated warning devices are operational.

3.12.7 Will yield right of way to pedestrians, emergency vehicles, and avoid pedestrian lanes.

3.12.8 Will drive cautiously on uneven or slippery surfaces.

3.12.9 Will ensure the load is pointed uphill where the gradient is greater than 10 percent.

3.12.10 Will ensure fire protection equipment is carried with the vehicle and is in proper working order.

4. Pre-start Requirements.

Powered Industrial Truck operator will follow these minimum guidelines.

Operators:

4.1 Will verify that all brakes, controls, gauges, lights, seat belts, and routine operational features are in proper working order. They will be examined before and after each shift. Defects when found will be immediately reported and corrected.

4.2 Will remove the truck from service any time it is found to be in need of repair, defective, or in any way unsafe, the truck will be taken out of service until it has been restored to safe operating condition.

4.3 Will check for leaks and perform necessary operator maintenance before starting vehicle.

4.4 Will report deficiencies to their Supervisor or Safety Manager.

4.5 Will ensure they know the load capacity and stay within it.

4.6 Will be cognizant of the planned route and aware of areas with inadequate headroom, lighting, obstructions, and floor surface problems.

4.7 Will wear the same level of personal protective equipment as the personnel they are directly working with.

4.8 Will not engage in stunt driving or horseplay.

4.9 Will slow down for wet and slippery floors.

4.10 Will properly secure dockboard or bridgeplates before they are driven over. Dockboard or bridgeplates will be driven over carefully and slowly and their rated capacity never exceeded.

4.11 Will approach any elevators slowly, and then enter squarely after the elevator car is properly leveled. Once on the elevator, the controls will be neutralized, power shut off, and the brakes set until the desired level is reached.

4.12 Motorized hand trucks must enter elevators or other confined areas with load end forward.

4.13 Running over loose objects on the roadway surface will be avoided.

4.14 While negotiating turns, speed will be reduced to a safe level by means of turning the hand steering wheel in a smooth, sweeping motion. Except when maneuvering at a very low speed, the hand steering wheel will be turned at a moderate, even rate.

4.15 Will use extreme care tilting the load forward or backward, particularly when high tiering. Tilting forward with load engaging means elevated will be prohibited except to pick up a load. An elevated load will not be tilted forward except when the load is in a deposit position over a rack or stack. When stacking or tiering, only enough backward tilt to stabilize the load will be used.

5. Loading/Unloading requirements.

Operators must follow these minimum requirements, they:

5.1 Will ensure load is within the trucks rated capacity.

5.2 Will place load squarely on forks until load touches carriage.

5.3 Will ensure load is stable and centered on forks, and stack or tie loose or uneven loads (or ensure proper personnel accomplish this prior to loading).

5.4 Will secure the vehicle when not in use to prevent unauthorized personnel from operating the vehicle.

5.5 Will tilt the mast back to lift load.

5.6 Will proceed straight into trailers or railcars to load/unload.

5.7 Will ensure if loading/unloading onto trucks that the wheels are chocked, brakes are engaged, and loading platform is positioned properly.

5.8 Will ensure if loading/unloading onto or from racks the proper safe weight or height-to-load ratio is maintained.

5.9 Will ensure if loading/unloading onto or from stacked materials the proper safe weight or height-to-load ratio is maintained.

6. Parking requirements.

When parking, operators:

6.1 Must select flat parking surfaces, away from traffic where the vehicle does not block doors, pedestrian routes, aisles, exits, etc.

6.2 Must not leave a truck unattended or be more than 25 feet from the vehicle without:

6.3 Fully lowering load-engaging means, neutralizing controls, shutting off power, setting the brakes, and removing the keys.

6.3.1 Blocking the wheels if parked on an incline.

7. Refueling requirements.

7.1 Refuel only in assigned, ventilated areas containing no ignition sources.

7.2 Turn off engine.

7.3 Have fire suppression and cleanup equipment available.

7.4 Extinguish smoking materials.

7.5 Use acid-resistant material-handling equipment and wear corrosion-resistant PPE during battery charging/changing.

7.5.1 Remove battery cap slowly and leave open.

7.5.2 Pour acid into water, not water into acid.

7.5.3 Follow the vehicle manufacturer's instructions for gas or propane fueling.

7.5.4 Never use open flame to check fuel level.

7.5.5 Try to prevent spills, clean any spills promptly, replace fuel cap before starting or moving vehicle.

7.5.6 Store empty propane tanks in the designated container disposal/storage area located at the jobsite or main office.

7.6 Spilled electrolyte. Facilities will be provided for flushing and neutralizing

spilled electrolyte, for fire protection, for protecting charging apparatus from damage by trucks, and for adequate ventilation for dispersal of fumes from gassing batteries.

7.7 Battery maintenance requirements. Reinstalled batteries will be properly positioned and secured in the truck. A carboy tilter or siphon will be provided for handling electrolyte. When charging batteries, acid will be poured into water; water will not be poured into acid. Trucks will be properly positioned and brake applied before attempting to change or charge batteries. Care will be taken to assure that vent caps are functioning. The battery (or compartment) cover(s) will be open to dissipate heat. Smoking will be prohibited in the charging area. Precautions will be taken to prevent open flames, sparks, or electric arcs in battery charging areas. Tools and other metallic objects will be kept away from the top of uncovered batteries.

8. Modifications/Labels.

8.1 No modifications or additions, which affect capacity and safe operation, will be performed without the manufacturers prior written approval. Capacity, operation, maintenance instruction plates, tags, or decals will be changed accordingly.

8.2 If the truck is equipped with front-end attachments other than factory-installed attachments, the truck will be marked to identify the attachments and show the approximate weight of the truck and attachment combination at maximum elevation with load laterally centered.

8.3 All nameplates and markings will be verified as being in place and maintained in a legible condition.

SUBJECT: Steel Erection Safety Program.

REGULATORY STANDARD: OSHA - 29 CFR

GENERAL: M&M ERECTORS will ensure that the requirements of the OSHA Standard for Steel Erection be adhered to. This program is intended to address the issues of employee training, authorization, safety requirements, fire protection, maintenance, and the general steel erection sequence within our jobsites.

RESPONSIBILITY: The Safety Manager is the program coordinator, acting as the representative of M&M ERECTORS owners, who have the ultimate responsibility for all facets of this program. The Safety Manager is the sole person authorized to amend these instructions. M&M ERECTORS has authorized the Safety Manager and any Supervisor or Employee to halt any operation of M&M ERECTORS where there is danger of serious personal injury. Supervisors are required to ensure their employees are aware of the contents of this program and have received training before assignment to work.

Contents of the Confined Space Entry Program

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

STEEL ERECTION PROGRAM

1. Written Program.

M&M ERECTORS, Inc. will review and evaluate this program on an annual basis, or when changes occur to 29 CFR 1926, that prompt revision of this document, or when operational changes occur that require a revision of this document.

2. Specific Responsibilities:

2.1 Safety Manager. The company's Safety Manager will be responsible to ensure that all subcontractors performing steel erection submit a copy of their written steel erection safety program and copies of documentation of training prior to beginning work.

2.2 Supervisors. Company Supervisors are responsible for developing a site steel erection plan prior to commencing work. Supervisors will notify the Safety Manager immediately if there is any doubt as to the designation of a work area where steel erection work will take place.

2.2.1 Training Verification: Verify that each person participating in the steel erection has documentation of training prior to commencing work.

3. Training Requirements:

3.1 Training personnel. Training required by this section shall be provided by a qualified person(s).

3.2 Fall hazard training. The employer shall provide a training program for all employees exposed to fall hazards. The program shall include training and instruction in the following areas:

3.3 The recognition and identification of fall hazards in the work area;

3.4 The use and operation of guardrail systems (including perimeter safety cable systems), personal fall arrest systems, positioning device systems, fall restraint systems, safety net systems, and other protection to be used;

3.5 The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used;

3.6 The procedures to be followed to prevent falls to lower levels and through or into holes and openings in walking/working surfaces and walls; and

3.7 The fall protection requirements of this Safety Program

3.8 Special training programs. In addition to the training required in paragraphs (a) and (b) of this section, the employer shall provide special training to employees engaged in the following activities.

(1) Multiple lift rigging procedure. The employer shall ensure that each employee who performs multiple lift rigging has been provided training in the following areas:

(i) The nature of the hazards associated with multiple lifts; and

(ii) The proper procedures and equipment to perform multiple lifts required by §1926.753(e).

(2) Connector procedures. The employer shall ensure that each connector has been provided training in the following areas:

(i) The nature of the hazards associated with connecting; and

(ii) The establishment, access, proper connecting techniques and work practices required by §1926.756(c) and § (b).

(3) Controlled Decking Zone Procedures. Where CDZs are being used, the employer shall assure that each employee has been provided training in the following areas:

(i) The nature of the hazards associated with work within a controlled decking zone; and

(ii) The establishment, access, proper installation techniques and work practices required by § (c) and §1926.754(e)

4. Controlling Contractor Responsibilities

4.1 Site layout, site-specific erection plan, and construction sequence

(i) Approval to begin steel erection. Before authorizing the commencement of steel erection, the controlling contractor shall ensure that the steel erector is provided with the following written notifications:

(ii) The concrete in the footings, piers and walls and the mortar in the masonry piers and walls has attained, on the basis of an appropriate ASTM standard test method of field-cured samples, either 75 percent of the intended minimum compressive design strength or sufficient strength to support the loads imposed during steel erection.

(iii) Any repairs, replacements and modifications to the anchor bolts were conducted in accordance with §1926.755(b).

(iv) Site layout. The controlling contractor shall ensure that the following is provided and maintained:

(v) Adequate access roads into and through the site for the safe delivery and movement of derricks, cranes, trucks, other necessary equipment, and the material to be erected and means and methods for pedestrian and vehicular control. Exception: this requirement does not apply to roads outside of the construction site.

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

5. Fall Protection

(1) Each employee engaged in a steel erection activity who is on a walking/working surface with an unprotected side or edge more than 15 feet (4.6 km) above a lower level shall be protected from fall hazards by guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems.

(2) Perimeter safety cables. On multi-story structures, perimeter safety cables shall be installed at the final interior and exterior perimeters of the floors as soon as the metal decking has been installed on the top and midrail.

(3) Connectors and employees working in controlled decking zones shall be protected from fall hazards.

Connectors. Each connector shall:

(1) Be protected from fall hazards of more than two stories or 30 feet (9.1 m) above a lower level, whichever is less;

(2) Have completed connector training in accordance with §1926.761; and

(3) Be provided, at heights over 15 and up to 30 feet above a lower level, with a personal fall arrest system, positioning device system or fall restraint system and wear the equipment necessary to be able to be tied off; or be provided with other means of protection from fall hazards

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

(1) Each employee working at the leading edge in a CDZ shall be protected from fall hazards of more than two stories or 30 feet (9.1 m), whichever is less.

(2) Access to a CDZ shall be limited to only those employees engaged in leading edge work.

(3) The boundaries of a CDZ shall be designated and clearly marked. The CDZ shall not be more than 90 feet (27.4 m) wide and 90 (27.4 m) feet deep from any leading edge. The CDZ shall be marked by the use of control lines or the equivalent.

(4) Each employee working in a CDZ shall have completed CDZ training in accordance with §1926.761.

(5) Unsecured decking in a CDZ shall not exceed 3,000 square feet (914.4 m2).

(6) Safety deck attachments shall be performed in the CDZ from the leading edge back to the control line and shall have at least two attachments for each metal decking panel.

(7) Final deck attachments and installation of shear connectors shall not be performed in the CDZ.

Criteria for Fall Protection Equipment.

(1) Guardrail systems, safety net systems, personal fall arrest systems, positioning device systems and their components shall conform to the criteria in §1926.502.

(2) Fall arrest system components shall be used in fall restraint systems and shall conform to the criteria in §1926.502. Either body belts or body harnesses shall be used in fall restraint systems.

(3) Perimeter safety cables shall meet the criteria for guardrail systems in §1926.502.

Custody of fall protection. Fall protection provided by the steel erector shall remain in the area where steel erection activity has been completed, to be used by other trades, only if the controlling contractor or its authorized representative

(1) Has directed the steel erector to leave the fall protection in place; and

(2) Has inspected and accepted control and responsibility of the fall protection prior to authorizing persons other than steel erectors to work in the area.

Falling object protection

(a) Securing loose items aloft. All materials, equipment, and tools, which are not in use while aloft, shall be secured against accidental displacement.

(b) Protection from falling objects other than materials being hoisted. The controlling contractor shall bar other construction processes below steel erection unless overhead protection for the employees below is provided.

6. Steel Erection

6.1Hoisting and rigging

Working under loads

A. Routes for suspended loads shall be pre-planned to ensure that no employee is required to work directly below a suspended load except for:

(i) Employees engaged in the initial connection of the steel; or

(ii) Employees necessary for the hooking or unhooking of the load.

B. When working under suspended loads, the following criteria shall be met:

(i) Materials being hoisted shall be rigged to prevent unintentional displacement;

(ii) Hooks with self-closing safety latches or their equivalent shall be used to prevent components from slipping out of the hook; and

(iii) All loads shall be rigged by a qualified rigger.

6.2 Structural Steel Assembly

A. Structural stability shall be maintained at all times during the erection process.

B. The following additional requirements shall apply for multi-story structures:

(1) The permanent floors shall be installed as the erection of structural members progresses, and there shall be not more than eight stories between the erection floor and the upper-most permanent floor, except where the structural integrity is maintained as a result of the design.

(2) At no time shall there be more than four floors or 48 feet (14.6 m), whichever is less, of unfinished bolting or welding above the foundation or uppermost permanently secured floor, except where the structural integrity is maintained as a result of the design.

(3) A fully planked or decked floor or nets shall be maintained within two stories or 30 feet (9.1 m), whichever is less, directly under any erection work being performed.

(4) Roof and floor holes and openings. Metal decking at roof and floor holes and openings shall be installed as follows:

(i) Framed metal deck openings shall have structural members turned down to allow continuous deck installation except where not allowed by structural design constraints or constructability.

(ii) Roof and floor holes and openings shall be decked over. Where large size, configuration or other structural design does not allow openings to be decked over (such as elevator shafts, stair wells, etc.) employees shall be protected with guardrails.

(iii) Metal decking holes and openings shall not be cut until immediately prior to being permanently filled with the equipment or structure needed or intended to fulfill its specific use and which meets the strength requirements of paragraph (e)(3) of this section, or shall be immediately covered.

(5) Covering roof and floor openings.

(i) Covers for roof and floor openings shall be capable of supporting, without failure, twice the weight of the employees, equipment and materials that may be imposed on the cover at any one time.

(ii) All covers shall be secured when installed to prevent accidental displacement by the wind, equipment or employees.

(iii) All covers shall be painted with high-visibility paint or shall be marked with the word "HOLE" or "COVER" to provide warning of the hazard.

(iv) Smoke dome or skylight fixtures that have been installed, are not considered covers for the purpose of this section unless they meet the strength requirements of paragraph (e)(3)(i) of this section.

(6) Decking gaps around columns. Wire mesh, exterior plywood, or equivalent, shall be installed around columns where planks or metal decking do not fit tightly. The materials used must be of sufficient strength to provide fall protection for personnel and prevent objects from falling through.

(7) Installation of metal decking.

(i) Except as provided in §1926.760(c), metal decking shall be laid tightly and immediately secured upon placement to prevent accidental movement or displacement.

(ii) During initial placement, metal decking panels shall be placed to ensure full support by structural members.

6.3 Column anchorage

A. General requirements for erection stability.

(1) All columns shall be anchored by a minimum of 4 anchor rods (anchor bolts).

6.4 Beams and columns

A. A competent person shall determine if more than two bolts are necessary to ensure the stability of cantilevered members; if additional bolts are needed, they shall be installed.

B. Column splices. Each column splice shall be designed to resist a minimum eccentric gravity load of 300 pounds (136.2 kg) located 18 inches (.46 m) from the extreme outer face of the column in each direction at the top of the column shaft.

6.5 Open web steel joists

(3) Hoisting cables shall not be released until the seat at each end of the steel joist is field-bolted, and each end of the bottom chord is restrained by the column stabilizer plate.

(i) Each end of "K" series steel joists shall be attached to the support structure with a minimum of two -inch (3 mm) fillet welds 1 inch (25 mm) long or with two ½-inch (13 mm) bolts, or the equivalent.

(iv) Panels that have been pre-assembled from steel joists with bridging shall be attached to the structure at each corner before the hoisting cables are released.

6.6 Landing and Placing Loads.

(1) During the construction period, the employer placing a load on steel joists shall ensure that the load is distributed so as not to exceed the carrying capacity of any steel joist.

(2) Except for paragraph (e)(4) of this section, no construction loads are allowed on the steel joists until all bridging is installed and anchored and all joist-bearing ends are attached.

7. Definitions.

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

Connector means an employee who, working with hoisting equipment, is placing and connecting structural members and/or components.

Controlled Decking Zone (CDZ) means an area in which certain work (for example, initial installation and placement of metal decking) may take place without the use of guardrail systems, personal fall arrest systems, fall restraint systems, or safety net systems and where access to the zone is controlled.

Controlling Contractor means a prime contractor, general contractor, construction manager or any other legal entity which has the overall responsibility for the construction of the project – its planning, quality and completion

Double Connection means an attachment method where the connection point is intended for two pieces of steel which share common bolts on either side of a central piece

Fall Restraint System means a fall protection system that prevents the user from falling any distance. The system is comprised of either a body belt or body harness, along with an anchorage, connectors and other necessary equipment. The other components typically include a lanyard, and may also include a lifeline and other devices.

Leading Edge means the unprotected side and edge of a floor, roof, or formwork for a floor or other walking/working surface (such as deck) which changes location as additional floor, roof, decking or formwork sections are placed, formed or constructed.

Metal Decking means a commercially manufactured, structural grade, cold rolled metal panel formed into a series of parallel ribs; this includes metal floor and roof decks, standing seam metal roofs, other metal roof systems and other products such as bar gratings, checker plate, expanded metal panels, and similar products. After installation and proper fastening, these decking materials serve a combination of functions including, but not limited to: a structural element designed in combination with the structure to resist, distribute and transfer loads, stiffen the structure and provide a diaphragm action; a walking/working surface; a form for concentrate slabs; a support for roofing systems; and a finished floor or roof.

Multiple Lift Rigging means a rigging assembly manufactured by wire rope rigging suppliers that facilitates the attachment of up to five independent loads to the hoist rigging of a crane.

Project Structural Engineer of Record means the registered, licensed professional responsible for the design of structural steel framing and whose seal appears on the structural contract documents.

Qualified person means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated the ability to solve or resolve problems relating to the subject matter, the work, or the project.
Steel Erection means the construction, alteration or repair of steel buildings, bridges and other structures, including the installation of metal decking and all planking used during the process of erection.

Unprotected sides and edges means any side or edge (except at entrances to points of access) of a walking/working surface, for example a, floor, roof, ramp or runway, where there is no wall or guardrail system at least 39 inches (1.0 m) high.

ATTACH THE SITE SPECIFIC

STEEL ERECTION PLAN HERE:

Company Form Index

Form Name	Form Description	INDEX #

SUBJECT: Hazard Communication Program

REGULATORY STANDARD: OSHA - 29 CFR 1910.1200

GENERAL: M&M ERECTORS will ensure that the hazards of all chemicals used at our job sites or facilities are evaluated and that information concerning their hazards is transmitted to all employees. This program is intended to address the issues of evaluating the potential hazards of chemicals, communicating information concerning these hazards, and establishing appropriate protective measures for employees.

RESPONSIBILITY: Effective implementation of this program requires support from all levels of management within this company. The Safety Manager is the program coordinator, acting as the representative of the company owners, who have the ultimate responsibility for all facets of this program. The Safety Manager has full authority to make necessary decisions to ensure success of the program. Supervisors are required to be familiar with the contents of this program, will ensure the program is followed by their subordinates on a daily basis, and will maintain a copy of the program and MSDS's available for their subordinates. Subcontractors are responsible for maintaining a written Hazard Communication program for their employees. Subcontractors will submit, to the Safety Manager, copies of all MSDS are used at any M&M ERECTORS jobsite.

Contents of the Hazard Communication Program

HAZARD COMMUNICATION PROGRAM

1. Written Program.

This program will be maintained in accordance with 29 CFR 1910.1200 and updated annually or as required. This written program will be communicated to all personnel that are affected by it. M&M ERECTORS will make the written hazard communication program available to all employees, during each work shift.

2. Training Requirements.

M&M ERECTORS will provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment, annually, and whenever a new chemical is introduced into their work area that could present a potential hazard.

2.1 Information. M&M ERECTORS employees will be informed of:

2.1.1 The OSHA standard 29 CFR 1910.1200.

2.1.2 Any operations in their work area where hazardous chemicals are present.

2.1.3 The location and availability of the written hazard communication program, including a list(s) of hazardous chemicals used in their work area, and the associated material safety data sheet (MSDS).

2.2 Training. Employee hazard communication training at M&M ERECTORS will be conducted annually by the Safety Manager or an approved training instructor. Newly hired personnel will be briefed on the general requirements of the OSHA hazard communication standard, as well as duty specific hazards before they begin any duties at a new work area. This training will include at least the following:

2.2.1 Methods that may be used to detect the presence or release of a hazardous chemical in the work area. This will include; any monitoring conducted by M&M ERECTORS, continuous monitoring devices, visual appearance, or odor of hazardous chemicals when being released, etc. Material Safety Data Sheets (MSDS) will be used to augment this requirement where ever possible.

2.2.2 The physical and health hazards of the chemicals present in the work area (e.g., flash point, reactivity, toxicity).

2.2.3 The measures employees can take to protect themselves from these hazards. Specific procedures M&M ERECTORS has implemented to protect employees from exposure to hazardous

chemicals, to include; appropriate work practices, Programs, emergency procedures, and personal protective equipment.

2.2.4 An explanation of the labeling system used at M&M ERECTORS, the material safety data sheet, and how employees can obtain and use the appropriate hazard information.

2.2.5 The chemical (formal) and common name(s) of products used, and all ingredients which have been determined to be health hazards.

2.2.6 The primary route(s) of entry; inhalation, absorption, ingestion, injection, and target organs.

2.2.7 The OSHA permissible exposure limit, ACGIH Threshold Limit Value, including any other exposure limit used or recommended by the chemical manufacturer.

2.2.8 Whether the hazardous chemical has been found to be a potential carcinogen by the International Agency for Research on Cancer (IARC).

2.2.9 Any generally applicable precautions for safe handling and use, which are known including appropriate hygienic practices, protective measures during repair, maintenance of contaminated equipment and procedures for clean up of spills and leaks.

2.2.10 Emergency and first aid procedures.

2.3 Documentation. All training will be documented using an attendance roster. Certificates of completion will be issued to attendees by the Safety Manager and a copy of the completion certificate filed.

3. Labeling Requirements.

M&M ERECTORS, requires the labeling of containers of chemicals used at M&M ERECTORS, as well as of containers of chemicals and hazardous materials being shipped off site. The following procedures apply:

3.1 Unmarked Containers. No unmarked container containing chemicals may be used in conjunction with any duties or operations by employees of M&M ERECTORS Container Labeling. M&M ERECTORS will maintain and provide container labels to any employee requesting. Employees will ensure that labels on incoming containers of hazardous chemicals are not removed or defaced. Containers containing hazardous chemicals will be properly disposed of and the labels defaced after use. Once they are emptied, chemical containers can never be used in the place of any other container (for example, trash receptacles).

3.2 All container labels will list at least the chemical identity, appropriate hazard warnings, and the name and address of the manufacturer, importer or other

responsible party.

4. Material Safety Data Sheets and Hazardous Materials Inventory List.

The Purchasing Manager is responsible for obtaining MSDS's for every chemical used by M&M ERECTORS. The Safety Manager will maintain a master copy in the Management Office. In addition, the Safety Manager will review the MSDS's for all chemicals used to determine if additional precautions or special personal protective equipment will be required in order to ensure employee safety.

4.1 Supervisors will be responsible to maintain readily accessible copies of the MSDS's at the job sites and to ensure that all employees are aware of the location.

4.2 MSDS requests. A request letter will be forwarded to any vender who does not provide an MSDS with a product received by this company.

4.3 Hazardous Substances Inventory. The Company maintains an inventory of all known hazardous substances in use on the job site. A chemical inventory list is available from the Safety Manager (MSDS Log Book).

4.4 Hazardous substances brought onto the job site by the company will be included on the hazardous chemical inventory list in the MSDS Log Book or in a separate MSDS log for specific job information.

5. Non-Company Employees Program.

Visitors, Contract Employees, and Contractor Personnel. The Safety Manager and/or Supervisor will advise visitors, contract employees, and contractor personnel of any chemical hazards that may be encountered in the normal course of their work on the premises, the labeling system in use, the protective measures to be taken, the safe handling procedures to be used, and availability of MSDS's. Any contractor bringing chemicals on-site must provide M&M ERECTORS with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

6. Trade Secrets.

To protect trade secrets, the chemical manufacturer, importer, or employer may withhold the specific chemical identity, including the chemical name, and other specific identification of a hazardous chemical, from the material safety data sheet. To ensure the safety of our employees, M&M ERECTORS will obtain any information not shown on a MSDS from a supplier, when such information is needed to determine the hazardous constituents of chemicals used within our facility or by our employees. M&M ERECTORS employees will not use a specific chemical, if they cannot determine from the MSDS (or other approved source) proper protective measures to be used.

7. Non-Routine Tasks.

No employee will be allowed to perform tasks that they are not fully trained to accomplish. Non-routine tasks will be evaluated prior to accomplishment of work and the related hazard assessed to develop protective measures.

8. Chemical Storage.

M&M ERECTORS will ensure that proper storage locations are provided to employees using chemicals. Flammable chemicals will be stored in approved flammable liquids cabinets designed in accordance with 29 CFR 1910.106. Toxic and corrosive chemicals will be stored apart from flammable chemicals and will be further segregated according to acidity and/or alkalinity. All chemical storage location will be approved by the Safety Manager before use.

9. CERTIFICATION OF HAZ.COM. TRAINING

I,_____, have attended training on the Hazard Communication Program for employees of M&M ERECTORS

I know where the Hazard Communication Program, the MSDS's and the emergency first aid kit are kept.

I am aware I can review the copies of the written program, hazardous chemical inventory list and MSDS's.

Print Name: _____ Employee #: _____

Signed: _____ Date: _____

Instructor Signature: _____ Date: _____

HAZARD RATING INDEX

COLOR AND NUMBER CODED LABEL SYSTEMS

COLOR BAR TYPE LABELS

HEALTH	FLAMMABILITY	REACTIVITY
4 - DEADLY	(FLASH POINTS) 4 - SEVERE BELOW 73° F	4 - MAY DETONATE
3 - EXTREME HAZARD	3 - SERIOUS BELOW 100° F	3 - STRONG SHOCK AND HEAT - MAY DETONATE
2 - HAZARDOUS	2 - MODERATE BELOW 200° F	2 - VIOLENT CHEMICAL CHANGE POSSIBLE
1 - SLIGHTLY HAZARDOUS	1 - SLIGHT ABOVE 200° F HAZARDOUS	1 - UNSTABLE IF HEATED
0 - NO HAZARD	0 - MODERATE WILL NOT BURN	0 - NO HAZARD

NFPA TYPE LABELS

4 - DEADLY

3 - EXTREME HAZARD

2 - HAZARDOUS

1 - SLIGHTLY HAZARDOUS

0 - NO HAZARD

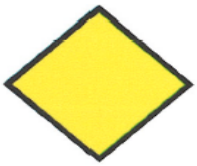
(FLASH POINTS)
4 - SEVERE BELOW 73o F

3 - SERIOUS BELOW 100o F

2 - MODERATE BELOW 200o F

1 - SLIGHT ABOVE 200o F HAZARDOUS

0 - MODERATE WILL NOT BURN



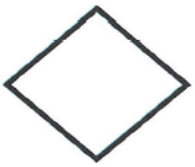
4 - MAY DETONATE

3 - STRONG SHOCK AND HEAT - MAY DETONATE

2 - VIOLENT CHEMICAL CHANGE POSSIBLE

1 - UNSTABLE IF HEATED

0 - NO HAZARD



OXY - OXIDIZER

ACID - ACID

ALK - ALKALI

COR - CORROSIVE

~~W~~ - USE NO WATER

- RADIATION HAZARD

COLOR AND NUMBER CODED LABEL SYSTEMS

PERSONAL PROTECTION EQUIPMENT


SAFETY GLASSES


PROTECTIVE BOOTS


GLOVES


DUST AND VAPOR RESPIRATOR


PROTECTIVE APRON


FULL PROTECTIVE SUIT


SPLASH GOGGLES


AIR LINE HOOD OR MASK

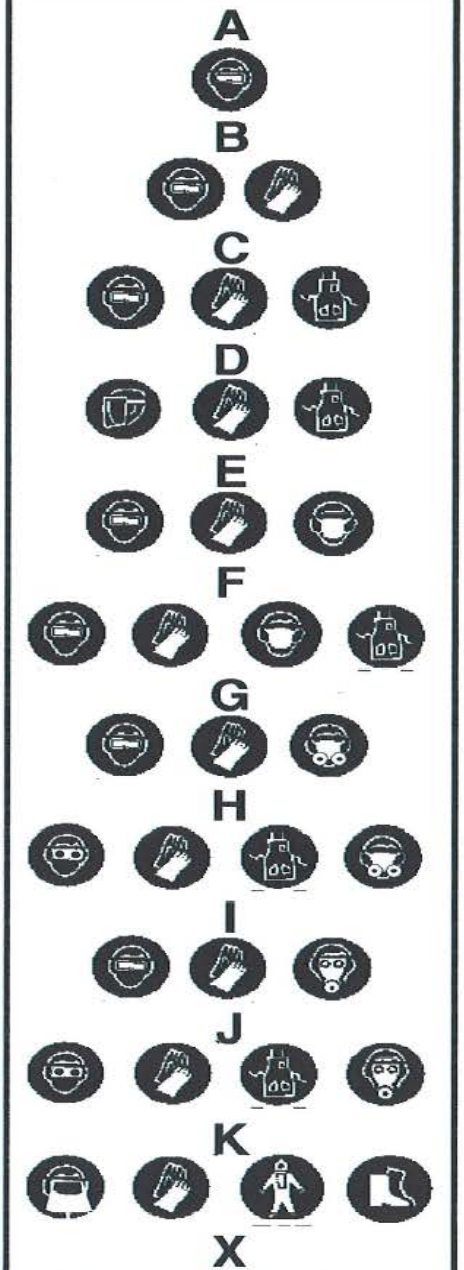

FACE SHIELD


DUST / MIST MASK

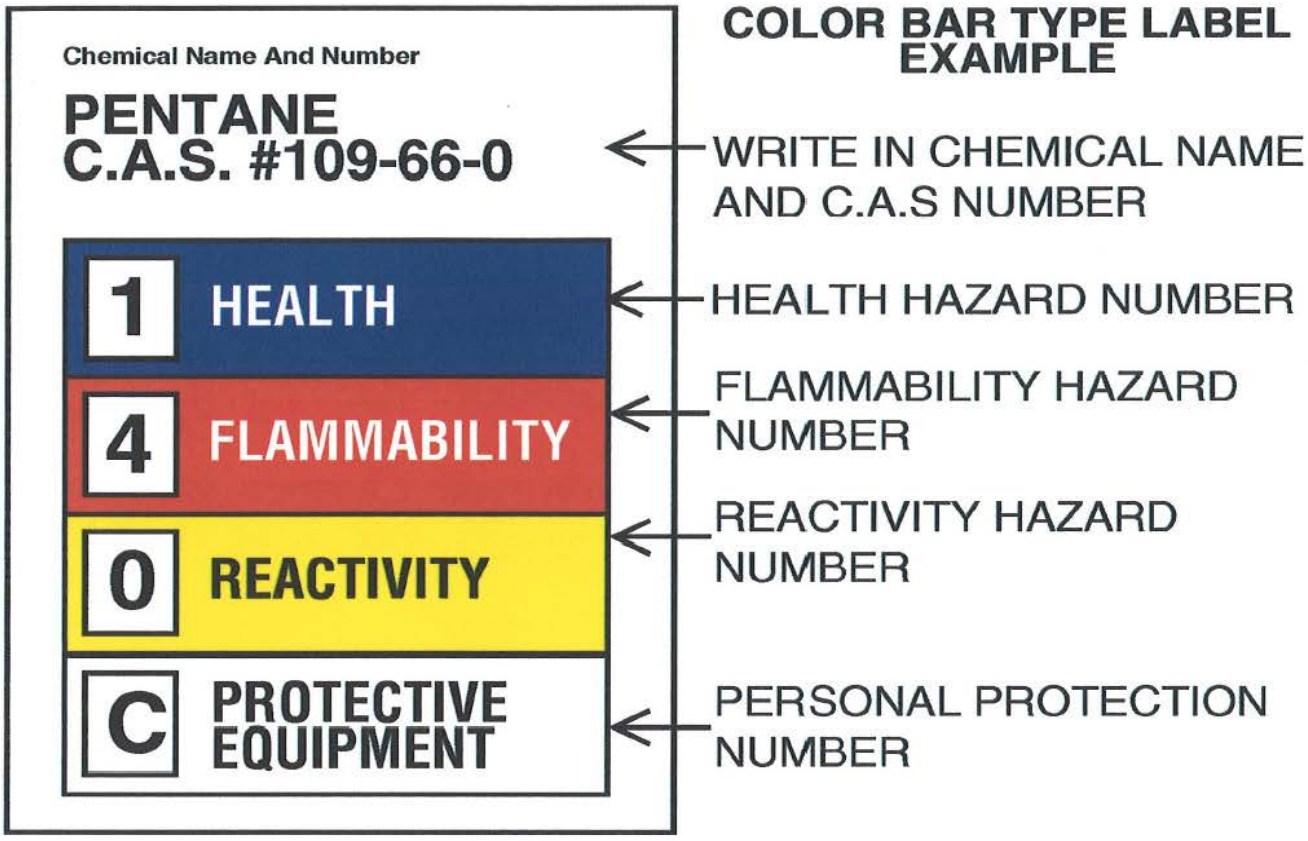

SELF CONTAINED BREATHING APPAR.

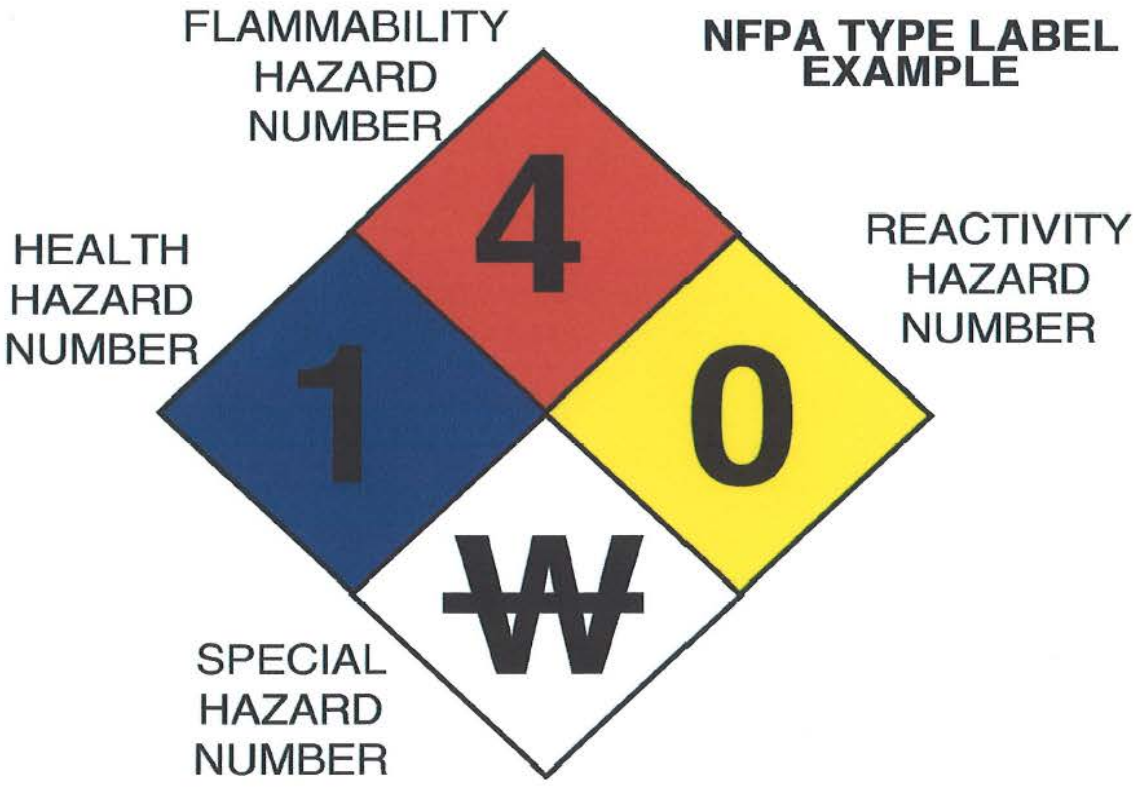

VAPOR RESPIRATOR

PROTECTION EQUIPMENT GUIDE



ASK YOUR SUPERVISOR FOR SPECIAL HANDLING INSTRUCTIONS


COLOR BAR TYPE LABEL EXAMPLE
Chemical Name And Number
PENTANE
C.A.S. #109-66-0
WRITE IN CHEMICAL NAME AND C.A.S NUMBER
1 HEALTH
HEALTH HAZARD NUMBER
4 FLAMMABILITY
FLAMMABILITY HAZARD NUMBER
0 REACTIVITY
REACTIVITY HAZARD NUMBER
C PROTECTIVE EQUIPMENT
PERSONAL PROTECTION NUMBER


NFPA TYPE LABEL EXAMPLE
FLAMMABILITY HAZARD NUMBER
HEALTH HAZARD NUMBER
REACTIVITY HAZARD NUMBER
4
1
0
W
SPECIAL HAZARD NUMBER

CHEMICAL HAZARD RATING

COMPOUND	H	F	R	S/N
Acetal	2	3	0	
Acetaldehyde	2	4	2	
Acetic Acid (glacial)	2	2	1	
Acetic Anhydride	2	2	1	W
Acetone	1	3	0	
Acetonitrile	2	3	0	
Acetophenone	1	2	0	
Acetyl Chloride	3	3	2	W
Acetylene	1	4	3	
Acetyl Peroxide	1	2	4	
Acrolein	3	3	2	
Acrolein Dimer	1	2	1	
Acrylic Acid (glacial)	3	2	2	
Acrylonitrile	4	3	2	
Adipic Acid	-	1	0	
Adiponitrile	4	2	0	
Aldol	3	2	2	
Allyl Acetate	1	3	0	
Allyl Alcohol	3	3	0	
Allyl Bromide	3	3	1	
Allyl Chloride	3	3	1	
Aluminum (dust or powder)	0	1	1	
3-Aminopropanol	3	2	0	
Amonia, Anhydrous	3	1	0	
Ammonium Bromide	2	0	0	
Ammonium Chloride	2	0	0	
Ammonium Fluoride	3	0	0	
Ammonium Nitrate	2	0	3	OX
Ammonium Perchlorate	2	0	4	OX
Ammonium Permanganate	2	0	3	OX
Ammonium Sulfate	3	0	0	
Amyl Acetate	1	3	0	
Amyl Alcohol	1	3	0	
Amylamine	3	3	0	
Amylbenzene	1	2	0	
Amyl Chloride	1	3	0	
Amyl Ether	1	2	0	
Amyl Maleate	0	1	0	
Amyl Nitrate	2	2	0	OX
o-Amyl Phenol	2	1	0	

COMPOUND	H	F	R	S/N
Amyl Stearate	0	1	0	
Amyl Toluene	2	2	0	
Aniline	3	2	0	
o-Anisidine	2	1	0	
Anisole	1	2	0	
Antimony Pentafluoride	3	0	1	
Antimony Pentasulfide	3	1	1	
Arsenic Chloride	3	0	0	
Arsenic Trisulfide	3	1	0	
Barium Chlorate	1	0	2	OX
Barium Nitrate	1	0	0	OX
Barium Peroxide	1	0	0	
Benzaldehyde	2	2	0	
Benzoic Acid	2	1	-	
Benzol (benzene)	2	3	0	
Benzotrifluoride	4	3	0	
Benzoyl Chloride	3	2	1	W
Benzyl Acetate	1	1	0	
Benzyl Alcohol	2	1	0	
Benzyl Cyanide	2	1	0	
Benzyl Salicilate	1	1	0	
Beryllium (dust or powder)	4	1	0	
Biphenyl	2	1	0	
Boron Trifluoride	3	0	1	
Bromine	4	0	0	OX
Bromine Trifluoride	4	0	3	W
				OX
Bromobenzene	2	2	0	
o-Bromotoluene	2	2	0	
Butadiene Monoxide	2	3	2	
Butane	1	4	0	
1-Butane	1	4	0	
Butenediol	1	1	0	
Butyl Acetate	1	3	0	
Butyl Acetoacetate	1	2	0	
Butyl Acrylate	2	2	2	
Butyl Alcohol	1	3	0	
Butylamine	2	3	0	
Butylamine Oleate	3	2	0	
Butylbenzene	2	2	0	

COMPOUND	H	F	R	S/N
Dibutyl Phthalate	0	1	0	
o-Dichlorobenzene	2	2	0	
1,2-Dichlorobutane	2	2	0	
1,1-Dichloroethene	2	4	2	
1,2-Dichloroethylene	2	3	2	
Dichlorosilane	3	4	2	
Didecyl Ether	0	1	0	
Diesel Fuel Oil No. 1	0	2	0	
Diethylamine	2	3	0	
Diethylene Glycol Dimethyl Ether	1	2	1	
Diethylene Triamine	3	1	0	
Diethyl Fumarate	1	1	0	
Diethyl Ketone	1	3	0	
Diethyl Succinate	1	1	0	
Diethyl Sulfate	3	1	1	
Diethylzinc	0	3	3	W
Dhexylamine	2	1	0	
Diisobutylamine	3	3	0	
Diisobutyl Carbinol	1	2	0	
Diisobutyl Ketone	1	2	0	
Diisooctyl Phthalate	0	1	0	
Diisopropylamine	3	3	0	
Diisopropyl Benzene	0	2	0	
Diketene	2	2	2	
Dimethylamine	3	4	0	
N,N-Dimethylaniline	3	2	0	
2,2-Dimethylbutane	1	3	0	
Dimethyldioxane	2	3	0	
N,N-Dimethylformamide	1	2	0	
Dimethyl Maleate	1	1	0	
2,3-Dimethyloctane	0	2	0	
2,3-Dimethylpentane	0	3	0	
Dimethyl Phthalate	0	1	0	
Dimethyl Sulfate	4	2	0	
Dimethyl Sulfide	2	4	0	
Dimethyl Sulfoxide	1	1	0	
Dinitrobenzene (ortho)	3	1	4	
2,4-Dinitrotoluene	3	1	3	
Dioctyl Ether	0	1	0	

COMPOUND	H	F	R
Dioxolane	2	3	2
Dipentene	0	2	0
Diphenylamine	3	1	0
Diphenyl Phthalate	0	1	0
Dipropylamine	3	3	0
Divinylbenzene	2	2	2
Divinyl Ether	2	3	2
Dodecane	0	2	0
1-Dodecanethiol	2	1	0
1-Dodecanol	0	1	0
Endrin (dry)	2	0	0
Epichlorohydrin	3	2	2
Ethane	1	4	0
Ethanolamine	2	2	0
Ethoxybenzene	0	2	0
3-Ethoxypropanal	2	2	0
Ethyl Acetate	1	3	0
Ethyl Acrylate	2	3	2
Ethyl Alcohol	0	3	0
Ethylamine	3	4	0
Ethylbenzene	2	3	0
Ethyl Benzoate	1	1	0
Ethyl Borate	2	3	0
Ethyl Bromide	2	1	0
Ethylbutylamine	3	3	0
Ethyl Butyl Carbonate	2	2	1
Ethyl Butyl Ether	2	3	0
Ethyl Butyl Ketone	1	2	0
Ethyl Butyrate	0	3	0
Ethyl Caprylate	2	2	0
Ethyl Chloride	2	4	0
Ethyl Crotonate	2	3	0
Ethylcyclohexane	1	3	0
Ethylene	1	4	2
Ethylenediamine	3	2	0
Ethylene Dichloride	2	3	0
Ethylene Glycol	1	1	0
Ethylene Glycol Dibutyl Ether	1	2	0
Ethylene Glycol Ethylbutyl Ether	1	2	0
Ethylene Glycol Monobutyl			

COMPOUND	H	F	R	S/N
Ethylene Oxide	2	4	3	
Ethyl Ether	2	4	1	
Ethyl Formate	2	3	0	
Ethyl Isobutyrate	0	3	0	
Ethyl Mercaptan	2	4	0	
4-Ethylmorpholine	2	3	0	
Ethyl Nitrate	2	3	4	
Ethyl Oxalate	0	2	0	
Ethyl Propionate	-	3	0	
Ethyl Silicate	2	2	0	
Fluorine	4	0	3	W
				OX
Formaldehyde (water solution)	2	2	0	
Formamide	2	1	-	
Formic Acid	3	2	0	
Furan	1	4	1	
Furfuryl Alcohol	1	2	1	
Gas, Natural	1	4	0	
Gasoline 56-100 Octane	1	3	0	
Glycerine	1	1	0	
Glycidyl Acrylate	0	2	0	
Heptane	1	3	0	
2-Heptanol	0	2	0	
Heptylene	0	3	0	
Hexadecane	0	1	0	
Hexanol	2	3	1	
Hexane	1	3	0	
3-Hexanone	1	3	0	
1-Hexene	1	3	0	
Hexyl Alcohol	1	2	0	
Hexyl Methacrylate	0	2	0	
Hydrazine (Anhydrous)	3	3	2	
Hydrocyanic Acid-96%	4	4	2	
Hydrogen	0	4	0	
Hydrochloric Acid	3	0	0	
Hydrobromic Acid	3	0	0	
Hydrofluoric Acid	4	0	0	
Hydrogen Peroxide (35% to 52% by weight	2	0	1	OX
Hydrogen Sulfide	3	4	0	
Hydroquinone	2	1	0	

COMPOUND	H	F	R	S/N
Isoamyl Acetate	1	3	0	
Isoamyl Alcohol	1	2	0	
Isobutane	1	4	0	
Isobutyl Acetate	1	3	0	
Isobutyl Acrylate	1	3	1	
Isobutyl Alcohol	1	3	0	
Isobutylbenzene	2	2	0	
Isobutyl Chloride	2	3	0	
Isobutyl Methyl Ketone	2	3	0	
Isobutyraldehyde	2	3	1	
Isobutyric Acid	1	2	0	
Isobutyric Anhydride	1	2	1	W
Isodecalddehyde	0	2	0	
Isodecanoic Acid	0	1	0	
Isohexane	1	3	0	
Isooctane	0	3	0	
Isooctanoic Acid	0	1	0	
Isooctyl Alcohol	0	2	0	
Isopentane	1	4	0	
Isophorone	2	2	0	
Isoprene	2	4	2	
Isopropyl Acetate	1	3	0	
Isopropyl Alcohol	1	3	0	
Isopropyl Chloride	2	4	0	
Isopropyl Ether	2	3	1	
Jet Fuels (JP-4)	1	3	0	
Jet Fuels (JP-5)	0	2	0	
Lanolin	0	1	0	
Lead Arsenates	2	0	0	
Lead Nitrate	1	0	0	OX
Lead Thiocyanate	1	1	1	
Lithium	1	1	2	W
Lithium Hydride	3	4	2	W
Lubricating Oil, Mineral	0	1	0	
Magnesium (incl. all alloys)	0	1	2	W
Magnesium Nitrate	1	0	0	OX
Magnesium Perchlorate	1	0	0	OX
Maleic Anhydride	3	1	1	
Mercuric Cyanide	3	0	0	
Mesityl Oxide	3	3	0	
Methacrylic Acid	3	2	2	

COMPOUND	H	F	R	S/N
Methane	1	4	0	
Methyl Acetate	1	3	0	
Methyl Acrylate	2	3	2	
Methylal	2	3	2	
Methyl Alcohol	1	3	0	
Methylamine	3	4	0	
Methyl Amyl Ketone	1	2	0	
Methyl Benzoate	0	2	0	
Methyl Borate	2	3	1	
Methyl Bromide	3	1	0	
Methyl Butyl Ketone	2	3	0	
Methyl Carbonate	2	3	1	
Methyl Cellosolve Acetate	0	2	0	
Methyl Chloride	2	4	0	
Methyl Chloroacetate	2	2	1	
Methylcyclohexane	2	3	0	
Methylcyclohexanone	-	2	0	
Methylcyclopentane	2	3	0	
Methylene Chloride	2	1	0	
Methylene Diisoyanate	1	2	1	W
Methyl Ether	2	4	1	
Methyl Ethyl Ether	2	4	1	
Methyl Ethyl Ketone	1	3	0	
Methyl Formate	2	4	0	
Methyl Glycol Acetate	1	2	0	
Methyl Hexyl Ketone	0	2	0	
Methylhydrazine	3	3	2	
Methyl Isoamyl Ketone	1	2	0	
Methyl Isobutyl Carbinol	2	2	0	
Methyl Isobutyl Ketone	2	3	0	
Methyl Isocyanate	2	3	3	W
Methyl Lactate	1	2	0	
Methyl Mercaptan	2	4	0	
Methyl Methacrylate	2	3	2	
Methyl Parathion (solid)	4	1	2	
2-Methyl-1-Pentene	1	3	0	
Methyl Phenylacetate	0	2	0	
1-Methyl Piperazine	2	2	0	
Methyl Propionate	1	3	0	
Methyl Propyl Ketone	2	3	0	
2-Methylpyrazine	2	2	0	

COMPOUND	H	F	R	S/N
Methylpyrrole	2	3	1	
Methylpyrrolidine	2	3	1	
Methyl Salicylate	1	1	0	
Methyl Stearate	0	1	0	
Methyl Toluene Sulfonate	2	1	0	
Methyl Vinyl Ketone	3	3	2	
Mineral Oil	0	1	0	
Mineral Spirits	0	2	0	
Morpholine	2	3	0	
Mustard Oil	3	2	1	
Naphtha	1	3	0	
Naphthalene	2	2	0	
Nickel Carbonyl	4	3	3	
Nicotine	4	1	0	
Nitric Acid	3	0	0	OX
p-Nitroaniline	3	1	3	
Nitrobenzene	3	2	0	
Nitrobiphenyl	2	1	0	
Nitrochlorobenzene	3	1	1	
Nitroethane	1	3	3	
Nitrogen (liquefied)	3	0	0	
Nitrogen Peroxide	3	0	0	
Nitrogen Trioxide	3	0	0	
Nitroglycerine	2	2	4	
Nitromethane	1	3	3	
1-Nitropropane	1	3	1	
o-Nitrotoluene	2	1	4	
Nonadecane	0	1	0	
Nonane	0	3	0	
Nonene	0	3	0	
Nonylbenzene	1	0	1	
Octadecane	0	1	0	
Octane	0	3	0	
2-Octanol	1	2	0	
1-Octene	1	3	0	
Oleic Acid	0	1	0	
Olive Oil	0	1	0	
Oxalic Acid	2	1	0	
Oxygen (liquid)	3	0	0	OX
Paraffin Oil	0	1	0	
Paraformaldehyde	2	1	0	

COMPOUND	H	F	R	S/N
Paraldehyde	2	3	1	
Parathion	4	1	2	
Pentaborane	3	3	2	
Pentachlorophenol (dry)	3	0	0	
Pentane	1	4	0	
Pentanoic Acid	2	1	0	
Pentaphen	2	1	0	
1-Pentene	1	4	0	
Perchloric Acid	3	0	3	OX
Perchloroethylene	2	0	0	
Petrolium, Crude	1	3	0	
Petrolium, Ether	1	4	0	
Phenol	3	2	0	
Phenylacetaldehyde	1	2	0	
Phenyl Acetate	1	2	0	
Phenylacetic Acid	1	1	0	
o-Phenylenediamine	-	1	0	
Phenylhydrazine	3	2	0	
Phenylpropyl Alcohol	0	1	0	
Phosgene	4	0	0	
Phosphine	3	4	1	
Phosphoric Acid	2	0	0	
Phosphorus Pentasulfide	3	1	2	W
Phosphorus, Red	0	1	1	
Phosphorus Trichloride	3	0	2	W
Phosphorus, White or Yellow	3	3	1	
Phosphoryl Chloride	3	0	2	W
Phthalic Acid	0	1	1	
Phthalic Anhydride	2	1	0	
Picric Acid	2	4	4	
Pine Oil	0	2	0	
Pine Tar	0	2	0	
Piperazine	2	2	0	
Piperidine	2	3	3	
Potassium	3	1	2	W
Potassium Bromate	1	0	0	OX
Potassium Chlorate	2	0	0	OX
Potassium Cyanide	3	0	0	
Potassium Hydroxide (lye)	3	0	1	
Potassium Nitrate	1	0	0	OX
Potassium Permanganate	1	0	0	OX

COMPOUND	H	F	R	S/N
Potassium Peroxide	3	0	2	W
				OX
Potassium Persulfate	1	0	0	
Potassium Sulfide	2	1	0	
Propane	1	4	0	
Propionic Acid	2	2	0	
Propionyl Chloride	3	3	1	
Propyl Acetate	1	3	0	
Propyl Alcohol	1	3	0	
Propylamine	3	3	0	
Propyl Chloride	2	3	0	
Propylene	1	4	1	
Propylene Dichloride	2	3	0	
Propylene Glycol	0	1	0	
Propylene Oxide	2	4	2	
n-Propyl Ether	-	3	0	
Propyl Nitrate	2	4	3	OX
Pyridine	2	3	0	
Pyrrole	2	2	0	
Pyrrolidine	2	3	1	
Quinoline	2	1	0	
Resorcinol	-	1	0	
Rhodinol	0	1	0	
Salicylic Acid	0	1	0	
Silane	1	4	2	
Silver Nitrate	1	0	0	OX
Sodium	3	1	2	W
Sodium Chlorate	1	0	2	OX
Sodium Chlorite	1	1	2	OX
Sodium Cyanide	3	0	0	
Sodium Fluoride	2	0	0	
Sodium Hydride	3	3	2	W
Sodium Hydroxide (lye)	3	1	0	
Sodium Nitrate	1	0	0	OX
Sodium Perchlorate	2	0	2	OX
Sodium Peroxide	3	0	2	W
				OX
Sodium Potassium Alloys	3	3	2	W
Sodium Sulfide	2	1	0	
Stannic Chloride	3	0	1	
Stearic Acid	1	1	0	

COMPOUND	H	F	R	S/N
Stearyl Alcohol	0	-	0	
Stoddard Solvent	0	2	0	
Styrene	2	3	2	
Sulfur	2	1	0	
Sulfer Chloride	2	1	2	W
Sulfer Dioxide	2	0	0	
Sulfuric Acid	3	0	2	W
Tannic Acid	0	1	0	
Terephthaloyl Chloride	3	1	0	
Tetrachlorobenxene	0	1	0	
Tetrachloroethylene	2	0	0	
Tetradecanol	0	1	0	
Tetraethylene Glycol	1	1	0	
Tetraethyl Lead, Compounds	3	2	3	
Tetrafluoroethylene	3	4	3	
Tetrahydrofuran	2	3	1	
Tetramethyl Lead, Compounds	3	3	3	
Thionyl Chloride	3	0	2	W
Thiophene	2	3	0	
Titanium Tetrachloride	3	0	1	
Toluene	2	3	0	
Toluene-2, 4-Diisocyanate	3	1	1	
o-Toluidine	3	2	0	
Triamylamine	2	1	0	
Triamylbenzene	0	1	0	
Tributylamine	2	2	0	
Tributyl Phosphate	2	1	0	
Tributylphosphine	0	1	0	
Tributyl Phosphite	2	1	1	
1, 1, 1-Trichloroethane	3	1	1	
Trichloroethylene	2	1	0	
Trichloroethylsilane	3	3	0	
Trichlorosilane	3	4	2	W
Triethanolamine	2	1	1	
Triethylamine	2	3	0	
Triethyl Phosphate	0	1	1	
Triisobutyl Borate	3	2	1	
Trimethylamine	2	4	0	
Trimethylchlorosilane	3	3	2	W
Trinitrobenzene	2	4	4	
Trinitrotoluene (tnt)	2	4	4	

COMPOUND	H	F	R	S/N
Trioxane	2	2	0	
Triphenylmethane	0	1	0	
Tripropylene	0	3	0	
Tripropylene Glycol	0	1	0	
Turpentine	1	3	0	
2-Undecanol	1	1	0	
Valeraldehyde	1	3	0	
Vanadium Tetrachloride	3	0	2	W
Vinyl Acetate	2	3	2	
Vinyl Bromide	2	0	1	
Vinyl Butyl Ether	2	3	2	
Vinyl Chloride	2	4	1	
Vinyl Crotonate	2	3	2	
Vinyl Ethyl Alcohol	0	2	0	
Vinyl Ethyl Ether	2	4	2	
Vinyl Fluoride	1	4	2	
Vinylidene Chloride	2	4	2	
Vinylidene Flouride	1	4	2	
Vinyl Methyl Ether	2	4	2	
Vinyl Propionate	2	3	2	
Vinyl Toluene	2	2	1	
o-Xylene	2	3	0	
o-Xylidine	3	1	0	
Zinc (powder or dust)	0	1	1	
Zinc Chlorate	2	0	2	OX
Zirconium Tetrachloride	3	0	2	

CHEMICAL INVENTORY INDEX

CHEMICAL INVENTORY INDEX

COMMON NAME	CHEMICAL, MANUFACTURER PRODUCT NAME	MSDS INDEX #

CHEMICAL INVENTORY INDEX

COMMON NAME	CHEMICAL, MANUFACTURER PRODUCT NAME	MSDS INDEX #

COMMERCIAL
FLEET SAFETY PROGRAM

M&M ERECTORS

PROGRAM ELEMENTS

Policy Statements

Operation of motor vehicles is a necessary part of **M&M ERECTORS** operations. The operation of motor vehicles exposes our company to a variety of risks: injury to employees, injury to members of the general public, damaged property, and possible negative influences to the company's reputation. Therefore, as part of management's commitment to operate all aspects of the business in a safe and responsible manner, the following policies should be endorsed:

The **M&M ERECTORS** program establishes guidelines and procedures to be followed to protect the safety of individuals operating any motor vehicle on company business. Protecting our employee drivers, their passengers, and the general public is of the highest priority to the company.

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

The purpose of this policy is to ensure the safety of the employees who drive or ride in company vehicles. Vehicle accidents can result in employee injuries, damaged vehicles and property, and a variety of higher costs. It is the driver's responsibility to operate the vehicle in a safe and courteous manner, following all of the motor vehicle regulations that apply to that vehicle. It is also the driver's responsibility to make sure that the vehicle is maintained in good condition by reporting any problems to the maintenance staff.

_____

Jim Robinson, Vice President Operations

Program Responsibilities

The fleet manager is responsible for the safe operation and enforcement of all driving policies. The fleet manager will authorize employees to drive company vehicles.

Hiring Policies

The minimum requirements for hiring the applicant will include the following:

- Applicants must have a valid license
- Complete written application
- No chargeable accidents in the past year
- No DUI or DWI convictions in the last 10 years
- No more than two “non-serious” moving violations in the past three years
- A minimum of 1 year of verifiable experience
- Meet all requirements of Department of Transportation for those individuals being hired to drive commercial motor vehicles

Authorized Vehicle Use

It is the policy of this company that the company vehicles provided for some of our employees are to be used **only** for company business.

Any personal use of the company vehicles is to be made in writing, or noted phone conversations with company executive officers, stating the nature of each personal use. A decision to allow limited personal use shall be based upon past driver performance and usage anticipated.

The company may allow its employees to drive the company vehicle home at night and on weekends for its convenience and/or security purposes. This may also be in case of client/project emergencies that these employees may be called upon to handle.

The use of company vehicles is restricted to employees of the company only. Non-employees such as spouses, children, other relatives, or friends are **not authorized** to drive company vehicles at any time.

The company will consider any unauthorized use of vehicles as the equivalent of theft and the driver may be held responsible (liable) for consequences of any accidents.

A driver road observation program is also in effect to monitor usage of the vehicles during business and off-hours. Employees driving company vehicles will be observed on a random basis, after call in complaints, and after an accident. If any negative results are found, a warning will be issued to the employee. As second warning will be cause for termination of employment in accordance with company policy.

Employees who use their personal vehicles for company business are required to carry adequate limits of liability, with a suggested minimum of $100,000 for property damage and $300,000 for bodily injury. A copy of the declaration page of your personal automobile insurance policy must be provided to M&M ERECTORS annually at your renewal date.

Motor Vehicle Records (MVR) Checks

MVRs will be checked upon hiring of a driver and then annually thereafter. MVRs will also be checked annually on any employee who may operate their personal vehicle for company business.

Driver Qualifications and Disciplinary Action

The review of motor vehicle records and accident experience is important as past driving records affords one of the best clues to future performance as safe and dependable drivers. Past experience has shown there is a high correlation between poor driving records and accident frequency. It is the policy of this M&M ERECTORS to review motor vehicle records and past accident experience before granting driving privileges and to review these records whenever an individual is involved in a motor vehicle accident and at least on an annual basis, to maintain driving privileges.

Driving privileges for both new and current drivers shall be based on the point system illustrated below. Any driver who accumulates **six points** or more within any **three** year period will have driving privileges revoked. In addition, new hires and/or potential drivers who have a major violation appearing on their motor vehicle record during the past five years, shall not be afforded driving privileges. Current drivers who are convicted of a major violation shall have their driving privileges revoked for five years from the date of the infraction.

Any driver with **four** or more points will be required to meet with management staff to discuss circumstances surrounding the violations. Determination will be made at the time of that conference as to further discipline which may include attendance in a certified defensive driving course, revocation of driving privileges for a period of time to be determined, or reassignment to non-driving job duties.

Point System

Points	Violation
6	Drug or alcohol related conviction
6	Possession of controlled substance
6	Operating while license suspended/revoked
6	Careless or reckless driving/racing
4	At fault accident
3	Speeding in excess of 25 MPH over posted speed
3	Disregard for traffic control device
2	Speeding

Note: The following are considered major violations and will equal 6 points:

DWI (alcohol or drug) Driving while impaired	Refuse alcohol test	Illegal possession
Failure to stop for an accident Vehicle used in connection with a felony	Evade arrest Revocation for habitual violator	Misrepresentation to avoid arrest Revocation for homicide
Revocation for manslaughter Misrepresentation to obtain a driver's license	Revocation for false statement Reckless disregard	Revocation for felony Racing contest

Driver Review Board

When an accident occurs, a driver review board will be convened to determine the blame for the accident. The board will be made up of management and labor. The board will determine discipline and/or retraining needs.

Vehicle Maintenance

To extend the useful life of all vehicles, regular inspections and maintenance schedules will be maintained. The assigned driver of each vehicle should ensure that all general maintenance is completed per manufacturer's recommendations. General maintenance includes oil changes, tire rotations, tire pressure checks, fluid level checks, washing and cleaning of the interior and exterior.

The vehicle should be inspected daily for cleanliness, proper tire pressure, nonfunctioning lights, motor oil, coolant, windshield wiper fluid, and fuel.

Driver Safety Rules

Drivers are required to follow all posted and/or accepted rules concerning the operation of a motor vehicle over both public and private roadways and property.

- Seat belt use – is mandated by law and M&M ERECTORS requires driver and passengers to wear seat belts while the vehicle is in normal operation.
- Impaired driving – a driver may not operate a motor vehicle at any time when his/her ability is impaired, affected, or influenced by alcohol, illegal drugs, medication, illness, fatigue or injury.
- Hitchhikers – do not pick up hitchhikers at any time.
- Cell phone use – should be used with discernment. The safe driving of the vehicle is the top priority. Plan the use of your cell phone when the vehicle is not moving. If you receive a call while driving, attempt to find a safe place to stop and take the call. Talking on a cell phone is distracting at any time, but the moment of greatest distraction is placing or receiving a phone call. A hands free set is a better situation than holding the phone and driving.
- Eating and drinking – eating while driving is prohibited. Non-alcoholic drinking can be done while driving, but use caution. The number one goal is safe driving.
- Radar detectors – are prohibited from use in company vehicles. Company vehicles should be operated within the posted speed limits.
- All rules of the road should be followed while operating a company vehicle.

Training

Upon initial assignment to a company vehicle, the employee should attend a safe driving class. The class should discuss safe driving habits and company policies. Additional training will be done through departmental meetings, quarterly meetings, payroll inserts, or interactive training on the computer.

Accident Handling and Reporting

If you are in an accident:

1. Stop your vehicle and protect the scene. You don't want a secondary accident to occur.
2. Call for medical assistance/assist the injured people.
3. Call the police and the company as soon as possible.
4. Never admit fault or apologize. Apologies could be interpreted as an admission of fault.
5. Locate witnesses and get important information from them. If possible get names, addresses and phone numbers.
6. Exchange pertinent information with other drivers.
7. Never argue with other drivers, witnesses or police.
8. Take photos of the accident.
9. As soon as reasonably possible, the driver should complete the forms in the accident reporting kit found in the vehicle. The report should be turned into the employee's supervisor.
10. Never make a statement to the media. Refer them to the company.
11. Always report the incident, no matter how small it seems.

Accident Investigation

Accident investigation will be handled internally or through the use of police reports and findings. All reports and photographs should be turned in as soon as reasonably possible. The supervisor along with the Fleet Manager and/or a Driver Review Board will determine accident preventability and the proper course of disciplinary action, if any action is necessary. Disciplinary actions can range from training to termination.

ACCIDENT REPORTING KIT

The following items can be found in the accident reporting kit. These items should be kept in the glove compartment along with a disposable camera.

- Accident Report Form
- Witness Cards
- Instructions for Accident Scenes

DOT INFORMATION

Specific sections of the "Federal Motor Carrier Safety Regulations" are referenced throughout the remainder of this policy. Copy of the regulations can be reviewed with the Fleet Manager upon request.

Personnel

Personnel qualification requirements can be found in sections 383 and 391. The following regulations specify driver requirements for operating a motor vehicle:

- Must be at least 21 years old;
- Must be able to read and speak English well enough to converse with the general public and read and understand highway traffic signs and signals in English;
- By experience, training, or both; the applicant must be able to safely operate the type of motor vehicle he/she is driving;
- Must qualify physically, as according to section 391.41;
- Must possess a valid commercial drivers license from at least one state;
- Must have furnished his/her employer with a list of violations as required by section 391.27;
- Must not be disqualified to drive a commercial motor vehicle (CMV) under the rules of section 391.15; and
- Must have successfully completed a driver's road test and been issued a certificate in accordance with section 391.21.

APPLICATION INFORMATION

When applying to drive a commercial motor vehicle for a motor carrier, certain information must to be on the application. The required application information is found in section 391.21. The application must contain the following:

- Name and address of the employing motor carrier
- Applicant's name, address, date of birth, and social security number
- Addresses where the applicant has resided over the past three years
- Date the application was submitted
- The issuing state, number, and expiration date of each un-expired CMV operator's license

- The applicant's experience, including the type of equipment operated
- List of all motor vehicle accidents in the last three years the applicant was involved in
- List of all violations of motor vehicle laws and ordinances which the applicant was convicted of over the last three years
- A statement about any license that may have been revoked and the circumstance behind it
- A list of all employers for the previous three years, the dates of employment, and reasons for leaving
- An additional 7 years of employment history if the driver is applying to operate a commercial motor vehicle, and
- A signature line certifying the information is accurate to the best of the applicant's knowledge

OTHER INFORMATION NEEDED

M&M ERECTORS is required under section 391.23 to check the driving and employment history of the applicant for the previous three years. The company will conduct a **road test**. The test will include: 1) a pre-trip inspection; 2) coupling and uncoupling; 3) placing the vehicle in operation; 4) using the vehicle's controls and emergency equipment; 5) driving in traffic; 6) turning; 7) braking and slowing without using brakes; 8) backing; and 9) parking.

A **physical examination** is required per section 391.41. The physical exam form must include specific information and the medical examiner must be qualified to conduct an exam required by the Federal Motor Carrier Regulations. A certificate of medical examination will be given upon completion of the examination.

Maintenance

The maintenance regulations can be found in Section 396 – Inspection, Repair, and Maintenance. Within the maintenance regulations, many types of inspections are required; examples include roadside, pre-trip, post-trip, and annual inspections. The following is a brief discussion on each type of inspection.

ROADSIDE INSPECTIONS

Authorized state and federal DOT officials can perform inspections on the highways and, in some cases, in terminals. When a vehicle is tagged "Out of Service," the vehicle cannot be operated again until all proper repairs are satisfactorily made to the vehicle. Most states and provinces use the North American Uniform Out-of-Service Criteria for inspections. Drivers have 24 hours to return to the terminal or mail in an Inspection Report (MCS-63) to the carrier. The carrier must certify the violations have been corrected within 15 days of the inspection.

PRE-TRIP INSPECTIONS

Although a pre-trip inspection is not required to be in writing, section 396.13 requires the driver to complete an inspection and "be satisfied that the motor vehicle is in safe operating condition." If defects were noted during the last pre-trip inspection, then the report should be reviewed and signed by the driver. The following are some of the items found in section 392.7 that should be checked:

- Service brakes, including trailer brake connections
- Parking brakes
- Steering mechanism
- Lighting devices and reflectors
- Tires
- Wheels and rims
- Horn
- Windshield wiper(s)
- Rear vision mirror(s)
- Coupling devices

The emergency equipment should also be checked per section 392.8. This includes:

- Fire extinguishers
- Spare flares
- Warning devices

POST-TRIP INSPECTIONS

Post-trip inspections require a written report. Requirements for the written report are found in section 396.11. The report will include the following:

- Service brakes, including trailer brake connections
- Parking brakes
- Steering mechanism
- Lighting devices and reflectors
- Tires
- Horn
- Windshield wiper(s)
- Rear-vision mirrors
- Coupling devices
- Wheels and rims
- Emergency equipment

PERIODIC/ANNUAL INSPECTION

Vehicles are to be inspected annually, as required by sections 396.17 & 23. Inspections will be completed by the maintenance shop or state certified maintenance facility. There are thirteen (13) items that need to be inspected including:

- Brake systems
- Coupling devices
- Exhaust system

- Fuel system
- Lighting devices
- Safe loading
- Steering mechanism
- Suspension
- Frame
- Tires
- Wheels and rims
- Windshield glazing
- Windshield wipers

Hours of Service

The complete text for Hours of Service can be found in section 395 – Hours of Service of Drivers. The rules of this section apply to all motor carriers and drivers with some exceptions. To learn more about the exceptions, please review section 395.1.

The following are the **maximum** driving times drivers are permitted to drive.

- 10 hours following 8 consecutive hours off duty;
- Any period after having been on duty 15 hours following 8 consecutive hours off duty;
- 60 hours in any 7 consecutive days (if the company does not operate every day of the week); or
- 70 hours in any 8 consecutive days (if the company operates every day of the week).

The duty status log must be provided to the fleet manager within 13 days following the completion of the form. M&M ERECTORS will retain the log for 6 months and the driver should keep in his/her possession the duty status log for the previous 7 consecutive days.

File Requirements

INFORMATION REQUIRED IN THE DRIVER QUALIFICATION FILES

A drivers' file must contain the following items per section 391.51 of the Federal Motor Carriers Safety Regulations:

- Employment Application (391.21)
- Certification of Compliance (383.21)
- Request for checks of Driver's Records (391.23)
- Employment background investigation (391.23)
- Record of Road Test (391.31)
- Certificate of Road Test (391.31)
- Written examination (391.35)
- Answers to written examination (391.35)
- Certification of Written Examination (391.35)
- Medical Examiner's Certificate (391.43)
- Drivers data sheet (395.8 (j) (2))
- Record of violations (391.27)
- Annual review of driver's record (391.25)
- Notice of disqualification (391.15)
- Notice of disqualification (383.51)
- Controlled substance testing results (391.83)
- Driver Data Sheet listing the hours worked for the previous seven days prior to hiring the driver
- Receipt for the Department of Transportation (DOT) Handbook

INFORMATION REQUIRED IN THE MAINTENANCE FILES

An individual file will be maintained on each vehicle.

The following information should be found in each vehicle's file.

- Work orders
- Repair orders
- Inspections
- Roadside inspections and repair orders should accompany the inspection form.
- A general information sheet should be in the file. The following information is required: year, make, model, VIN, and tire size. Recommended information includes the type of vehicle (tractor, straight truck, etc.), compartments, and sizes.

The maintenance records will be kept as long as the company owns the vehicle plus eighteen (18) months after the vehicle leaves the company's control.

INFORMATION REQUIRED IN THE ALCOHOL AND SUBSTANCE ABUSE FILES

General requirements – M&M ERECTORS will maintain the alcohol and controlled substances abuse prevention program. Copy of this program is available to each driver at time of hiring and additional copy can be provided by fleet manager.

Types of Records

- Collection process records
- Driver's test result records
- Other violations of section 382, Subpart D
- Evaluation records
- Education and training records
- Administrative records related to alcohol and controlled substance testing

General File Retention

Indefinite period - Records related to the education and training of breath alcohol technicians, screening test technicians, supervisors, and drivers while they perform that function plus two years after they no longer perform that function.

Five year period - 1) calibration documentation, 2) administration records related to alcohol and controlled substance testing program, and 3) a copy of each annual calendar year summary required by section 382.403.

Two-year period - Records related to the alcohol and controlled substances testing programs.

Driver File Retention

Five-year period –

- Records of driver alcohol test results indicating an alcohol concentration of 0.02 or greater
- Records of a verified positive controlled substance test

- Driver evaluation and referral

One-year period –

- Records of negative controlled substances results,
- Alcohol test results with a concentration less than 0.02, and
- Any canceled tests.

HAZARDOUS MATERIAL TRAINING

Hazardous material training covers many topics. For a complete discussion of the topics please refer to 49 CFR 172.100 – 172.704. Important areas in the hazardous material regulations are as follows:

172.100 – 172.102 Hazardous Material Table & Appendices
172.200 – 172.205 Shipping Papers
172.300 – 172.338 Package Marking
172.400 – 172.450 Labeling
172.500 – 172.560 Placarding
172.600 – 172.604 Emergency Response
172.700 – 172.704 Training

Hazardous material regulations cover three areas of training: general awareness/familiarization, function specific, and safety. Driver training is referred to in modal-specific training.

EMPLOYEE AUTHORIZATION FOR MVR REVIEW

I acknowledge that the information contained in the M&M ERECTORS Vehicle Fleet Safety Policy has been reviewed with me, and a copy of the policy and driver rules have been furnished to me. As a driver of a company vehicle, I understand that it is my responsibility to operate the vehicle in a safe manner and to drive defensively to prevent injuries and property damage.

I also understand that my employer will periodically review my Motor Vehicle Record to determine continued eligibility to drive a company vehicle. In accordance with the Fair Credit Reporting Act, I have been informed that a Motor Vehicle Record will be periodically obtained on me for continued employment purposes.

I acknowledge the receipt of the above disclosure and authorize my employer or its designated agent to obtain a Motor Vehicle Record report. This authorization is valid as long as I am an employee or employee candidate and may only be rescinded in writing.

_____

PRINT - EMPLOYEE'S NAME

_____

DRIVER'S LICENSE NUMBER

_____

EMPLOYEE'S SIGNATURE DATE

_____

REVIEWER'S SIGNATURE DATE

(Sign and retain the original copy in the employee's file)

FLEET DRIVER'S COMMITMENT

Date: _____ Location: _____

Name: _____ Vehicle number: _____

My signature on this commitment form indicates understanding of my responsibilities as a **M&M ERECTORS** fleet driver. I have received and read a copy of the Commercial Fleet Policy and agree to fulfill all my responsibilities as listed there in. These include, but are not limited to:

- Adhering to all policies and procedures governing the operation of my vehicle.
- Ensuring all preventative maintenance is performed on my vehicle in accordance with the Manufacture's guidelines.
- Maintaining a professional appearance and safe operating condition of the vehicle at all times.
- Submitting a copy of my current driver's license as requested.
- Submitting an accident report including police reports and photos within 24 hours of any accident.
- Prohibiting use of assigned vehicle by anyone not authorized to drive company vehicles.

Failure to comply with the conditions listed above can result in disciplinary action including termination.

_____

Driver's signature Date

_____

Name, Fleet Manager Date