

Nowland Associates, Inc. **Safety and Health Program**

1. Safety and Health Program Guidelines. Nowland Associates, Inc. will review and evaluate this document:

1.1 On an annual basis.

1.2 When changes occur to 29 CFR that prompt a revision.

1.3 When changes occur to any related regulatory document that prompts a revision of this document.

1.4 When company operational changes occur that require a revision of this document.

2. Written Individual Programs. This company will maintain written individual procedures for the types of hazards/issues that our employees will or could potentially be exposed to. Each program will be reviewed/revise on an annual basis, or as required by the respective governing OSHA Standard. Each program insofar as possible will be maintained as an independent program to avoid situations where it is unclear where responsibility for given issues belong. Effective implementation of these programs requires support from all levels of management within this company. Each written program will be communicated to personnel that is affected by it. Each will encompass the total workplace, regardless of the number of workers employed or the number of work shifts. They will be designed to establish clear goals, and objectives. T

3. Safety Committee.

3.1 Nowland Associates, Inc. does not currently use a formal safety committee. All employees are expected to be involved with safety in some aspect. Safety will be a subject at all meetings. If needs arise, or standards dictate the requirement, then one will be formed and implemented.

4. Routine Safety and Health Inspections. Routine safety and health inspections will be conducted of all company work areas and job sites. The inspection will be conducted to discover through specific, methodical auditing, checking, or inspection procedures; conditions and work practices that lead to job accidents and industrial illnesses. Employees are encouraged to report any safety hazards without the fear of reprisal. Currently, inspections are provided by Safety Resources, LLC. However, each supervisor and/or competent person is required to ensure a safe working environment DAILY.

4.1 Currently, on job sites, all supervisors are required to do a thorough inspection at the beginning of each workday.

4.2 Inspection Intervals. Inspections will be conducted on a regular basis, at least monthly, for OSHA compliance. Safety Resources, LLC is currently providing job site inspections.

4.3 Hazard Priority Classification System. Hazards will be rated according to the following rating system. Where it is unclear where a hazard should be rated the next higher priority classification will be assumed.

4.3.1 Priority 1 Hazard. The most serious type of unsafe condition or unsafe work practice that could cause loss of life, permanent disability, the loss of a body part (amputation or crippling injury), or extensive loss of structure, equipment, or material.

4.3.2 Priority 2 Hazard. An unsafe condition or work practice that could cause serious injury, industrial illness, or disruptive property damage.

4.3.3 Priority 3 Hazard. An unsafe condition or work practice that might cause a recordable injury or industrial illness or nondisruptive property damage.

4.3.4 Priority 4 Hazard. A minor condition, a housekeeping item or unsafe work practice infraction with little likelihood of injury or illness other than perhaps a first-aid case.

4.4 Inspection Elements. The following inspection elements will be checked during safety inspections, as a minimum. Where an individualized safety program exists, the company standard practice instruction will be used as the basis for the development of inspection criteria.

<u>Element</u>	<u>Criteria</u>
Equipment	Inspected, Operational?
Fall Hazards	Guardrails, Covers, PFAS?
Head Protection	Used, training, proper usage
Eye protection	Used, training, Z-87 rated protectors
Lighting	Suitable Illumination for work
Noise control	85db or less?, hearing protection?
Hand tools	Grounded, guarded, pressure switches
Chemicals	SDS's, labels, storage, Chemical Lists
First Aid	Kits, training
Cords/Tools	Inspected, GFCI's
Ladders	Inspected, Training, Proper set-up
Work practices	Unsafe work practices observed? (list)

4.5 Inspection Report. The safety officer will develop a safety report based on the inspection items noted during the inspection. The following items will be accomplished:

4.5.1 The report will be distributed immediately to personnel/subcontractors responsible for correcting deficiencies noted during the inspection. That personnel will then use the hazard classification system to prioritize deficiency correction.

4.5.2 The report will be distributed to all supervisors and key management personnel. Supervisors will brief the results to all employees under their control. Any employee requesting to be placed on the distribution list will be accommodated.

4.5.3 The safety officer will develop a statistical analysis of deficiencies noted to determine jobs/areas that have a high incidence of injury potential. These areas will be emphasized during inspections and meetings.

4.6 OSHA/MOSH/VOSH Inspections. When a Compliance Officer from the appropriate agency arrives at a job site, the supervisor will immediately notify a representative of Safety Resources, LLC for assistance. At this time, the Compliance Officer will be asked for qualification of a Focused Inspection. Elements addressed to qualify for a Focused Inspection are as follows:

- a comprehensive Safety & Health Program
- a designated Competent Person responsible for the implementation and monitoring of the Safety & Health Program
- the absence of “clear-view” violations of the following areas;

1. Fall hazards

- a. Roofing work
- b. Open-sided floors/platforms
- c. Floor holes/openings
- d. Scaffolding/Lifts

2. Electrical hazards

- a. Overhead power lines
- b. Cords/tools
- c. GFCI Protection
- d. Temporary wiring/receptacles

3. Caught in/between hazards

- a. Machinery/equipment
- b. Trenches

4. Struck-by hazards

- a. Falling objects
- b. Machinery/equipment
- c. Use of Controlled Access Zones

4.7 This program, along with specific safety programs, will be used as a basis for keeping the job site a safe and healthy workplace. Subcontractors will be required to complete a Contractor Safety Verification Form prior to work commencement. This will help ensure compliance with the Program. The Construction Focused Inspection Guidelines, as provided by OSHA in their Guidelines dated September 20, 1995, will be used as a guideline. (see addendum)

5. Safety Meetings. A well-ordered flow of information and communication system is essential to a good safety program. The company, through a program of safety meetings at all levels, intends to accomplish the goals of safety awareness, education, and participation.

5.1 Safety Training/Education. The safety officer will ensure proper training/education occurs for all employees. Supervisors can add the level of detail required to make the material completely relevant to his or employees at each specific job site. Safety Resources, LLC currently provides training/education necessary for compliance with OSHA's 29 CFR 1910 & 1926 standards. Training is provided by a qualified person. Documentation is provided.

5.2 Safety Meeting Schedules. Employees will be given safety updates/information on a regular basis. Safety meetings will be given immediately:

5.2.1 Upon initial job assignment or reassignment.

5.2.2 When operational changes to the equipment on the job occur.

5.2.3 When a co-worker is injured.

5.2.4 When manufacturers provide safety-related information pertaining to defects, use, etc., for equipment used by this company.

5.3 Staff Meetings. Safety will be included in the agenda of all staff meetings. The safety officer will keep all superintendents informed of safety performance developments in the area of accident prevention, and safety. Superintendents may ask the safety officer to provide safety briefings as required.

6. Emergencies, Accident, and Incident Reporting. The Nowland Associates, Inc. Hazard Report will be used by all employees to report potential or known hazards. The following procedures apply:

6.1 Person reporting hazard:

6.1.1 Notify supervisor of the hazard.

6.1.2 Accomplish hazard identification/correction if possible.

6.1.3 Fill out required sections of the hazard report.

6.1.4 Forward report immediately to the safety officer.

6.2 For workplace medical or fire emergencies, utilize 911. Provide assistance as necessary.

6.3 When emergencies require evacuation due to fire, weather-related emergencies, or other, report to company vehicles, if safe, account for personnel, and advise the office.

7. Accident Investigation. Accident investigation is primarily a fact-finding procedure; the facts revealed are used to prevent recurrences 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. Individual responsibilities for investigating must be pre-determined and assigned prior to incidents. Incident investigations should result in corrective actions and be documented. Lessons learned from incidents are shared with employees.

7.1 Immediate concerns.

7.1.1 Ensure any injured person receives proper care.

7.1.2 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.

7.1.3 Start the investigation promptly.

7.2 Accident Investigation Form. A standardized investigation form which details specific company requirements for investigation will be developed and used to gather data to determine causes and corrective actions.

7.3 While all incidents should be investigated, the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method.

7.4 Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques. Training requirements relative to incident investigation and reporting (Awareness, First Responder, Investigation, and training frequency) should be identified in the program.

7.5 Equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, marking devices such as flags, equipment manuals, etc.

7.6 Initial identification of evidence immediately following the incident might include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, and physical factors such as fatigue, age, and medical conditions.

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

7.8 Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed.

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

8. General Safety Rules for all Work Areas. The following safety rules are established by this company as general safety rules for all job sites.

8.1 Never operate any machine or equipment unless you are authorized and trained to do so.

8.2 Do not operate defective equipment. Do not use broken tools. Report them immediately. Inspect cords, use GFCI's on all portable tools/cords.

8.3 Never start on any hazardous job without being completely familiar with the safety techniques which apply to it.

8.4 Make sure all safety attachments are in place and properly adjusted before operating any tools.

8.5 Wear all protective garments and equipment necessary to be safe on the job. Wear proper shoes; sandals or other open-toed or thin-soled shoes should not be worn, safety shoes/boots are required for certain jobs.

8.6 Use seatbelts on all powered equipment.

8.7 Put tools and equipment away when they are not in use.

8.8 Do not lift items which are too bulky or too heavy to be handled by one person. Ask for assistance.

8.9 Use of alcohol and illegal drugs are not permitted on company premises, or on job sites.

8.10 Keep your vehicle, tools and all company equipment and areas which you use clean and neat.

8.11 Do not participate in horseplay or tease or otherwise distract fellow workers.

8.12 Never take chances. If you're unsure, your unsafe!

8.13 Ask for help, Let good common sense be your guide.

9. Recordkeeping Requirements. This employer fully understands that companies with eleven (11) or more employees at any time during the calendar year immediately preceding the current calendar year must comply with the provisions of 29 CFR 1904. This section provides for recordkeeping and reporting by Nowland Associates, Inc. covered under 29 CFR 1904 as necessary or appropriate for developing information regarding the causes and prevention of occupational accidents and illnesses, and for maintaining a program of collection, compilation, and analysis of occupational safety and health statistics both for this company and as part of the national system for analysis of occupational safety and health. Records shall be established on a calendar year basis.

9.1 This employer will report under 29 CFR 1904.8 concerning fatalities within 8 hours, hospitalizations, amputations or loss of an eye within 24 hours. Where applicable, any host facility will be verbally notified of incidents within 24 hours.

9.2 This employer will maintain a log of occupational injuries and illnesses under 29 CFR 1904.2 and make reports under 29 CFR 1904.21 upon being notified in writing by the Bureau of Labor Statistics that the employer has been selected to participate in a statistical survey of occupational injuries and illnesses.

9.3 Log and summary of occupational injuries and illnesses. This employer shall:

9.3.1 Maintain a log and summary of all recordable occupational injuries and illnesses by the calendar year.

9.3.2 Enter each recordable injury and illness on the log and summary as early as practicable but no later than 6 working days after receiving information that a recordable injury or illness has occurred. For this purpose, the OSHA No. 300 form or an equivalent which is as readable and comprehensible to a person not familiar with it will be used. The log and summary (OSHA 300A), shall be completed in the detail provided on the forms and instructions on form OSHA No. 300 and 300A.

9.3.3 If this employer elects to maintain the log of occupational injuries and illnesses at a place other than this establishment or by means of data-processing equipment, or both, it will meet the following criteria:

9.3.3.1 There will be available at the place where the log is maintained sufficient information to complete the log to a date within 6 working days after receiving information that a recordable case has occurred.

9.3.3.2 At each facility belonging to this company, there will be available a copy of the log which reflects separately the injury and illness experience of that establishment complete and current to a date within 45 calendar days.

9.4 **Supplementary Record.** In addition to the log of occupational injuries and illnesses (OSHA 300), this employer shall have available for inspection at each of our facilities within 6 working days after receiving information that a recordable case has occurred, a supplementary record for each occupational injury or illness for that establishment. The record shall be completed in the detail prescribed in the instructions accompanying Occupational Safety and Health Administration Form OSHA No. 301. Workmen's compensation, insurance, or other reports are acceptable alternative records if they contain the information required by Form OSHA No. 301 (according to OSHA). If no acceptable alternative record is maintained for other purposes, Form OSHA No. 301 shall be used or the necessary information will be otherwise maintained.

9.5 **Annual Summary.** This employer shall post an annual summary of occupational injuries and illnesses for each facility under our control. Form OSHA No. 300A will be utilized, including the following information from that form:

9.5.1 Calendar year covered.

9.5.2 Company name and establishment address.

9.5.3 Certification signature (by company official), title, and date.

9.5.4 If no injuries or illnesses occurred during the year, zeros will be entered on the totals line, and the form posted.

9.5.5 The summary shall be completed by February 1 of each calendar year. This company, or the officer or employee of the employer who supervises the preparation of the log and summary of occupational injuries and illnesses, shall certify that the annual summary of occupational injuries and illnesses is true and complete. The certification shall be accomplished by affixing the signature of the employer, or the officer or employer who supervises the preparation of the annual summary of occupational injuries and illnesses, at the bottom of the last page of the log and summary or by appending a separate statement to the log and summary certifying that the summary is true and complete.

9.5.6 This employer shall post a copy of the establishment's summary in each facility in the same manner required under 29 CFR 1903.2. The summary covering the previous calendar year shall be posted no later than February 1 and shall remain in place until May 1. For employees who do not primarily report or work at a fixed site belonging to this company, or who do not report to any fixed site on a regular basis, we shall satisfy this posting requirement by presenting or mailing a copy of the summary during the month of February of the following year to each such employee who receives pay during that month. (NOTE: For multi-establishment employers where operations have closed down in some establishments during the calendar year, it will not be necessary to post summaries for those establishments).

9.6 Records Retention. Records provided for in 29 CFR 1904.2, 1904.4, and 1904.5 (including form OSHA No. 300, 300A and its predecessor forms OSHA No. 100 and OSHA No. 200) will be retained for 5 years following the end of the year to which they relate.

9.7 Access to Records. This employer shall provide, upon request, records provided for in 29 CFR 1904.2, 1904.4, and 1904.5, for inspection and copying by any representative of the Secretary of Labor for the purpose of carrying out the provisions of the OSHA act, and by representatives of the Secretary of Health, Education, and Welfare, or by any representative of a State accorded jurisdiction for occupational safety and health inspections or for statistical compilation.

9.7.1 The log and summary of all recordable occupational injuries and illnesses (OSHA No. 300 and 300A) will, upon request, be made available to any employee, former employee, and to their representatives for examination and copying in a reasonable manner and at reasonable times. The employee, former employee, and their representatives shall have access to the log for any establishment in which the employee is or has been employed.

9.8 Reporting of fatality or multiple hospitalization accidents. Within 8 hours after the occurrence of an employment accident which is fatal, or, within 24 hours, any hospitalization, amputation or loss of an eye, this employer shall report the accident either orally or in writing to the nearest office of the Area Director of the Occupational Safety and Health Administration, U.S. Department of Labor. The reporting may be by telephone or electronically. The report shall relate the circumstances of the accident, the number of fatalities, and the extent of any injuries. It is understood that the Area Director may require such additional reports, in writing or otherwise, as he deems necessary, concerning the accident.

9.9 **Change of Ownership.** Should this company change ownership, the company shall preserve those records, if any, of the prior ownership which is required to be kept.

9.10 **Petitions for Recordkeeping Exceptions.** Should this wish to maintain records in a manner different from that required the company must submit a petition containing the information specified by the Regional Commissioner of the Bureau of Labor Statistics in our region.

9.11 **Employees not in Fixed Establishments.** Record requirements for company employees engaged in physically dispersed operations such as occur in construction, installation, repair or service activities who do not report to any fixed company establishment on a regular basis but are subject to common supervision will be satisfied by:

9.11.1 Maintaining the required records for each operation or group of operations which is subject to common supervision (field superintendent, field supervisor, etc.) in an established central place.

9.11.2 Having the address and telephone number of the central place available at each worksite.

9.11.3 Having personnel available at the central place during normal business hours to provide information from the records maintained there by telephone and by mail.

9.12 **Statistical Program.** This employer will comply with all requirements to maintain, provide, and use statistical summaries. Upon receipt of an Occupational Injuries and Illnesses Survey Form, this employer shall promptly complete the form in accordance with the instructions contained therein, and return it in accordance with the instructions.

10. Disciplinary Actions for Willful Unsafe Acts. Employee safety is paramount at this company. The willful commitment of an unsafe act cannot be condoned. Employees who willfully jeopardize their own or coworkers safety will be disciplined. The type of discipline can range from a verbal warning to dismissal. The company safety officer and supervisory personnel are responsible for enforcing this policy and the administrative chain of any employee may give employees a verbal warning for a known unsafe act or procedural, or operational infraction. Disciplinary action other than a release from shift without pay must be reviewed by the administration. Safety violations include (a) not following verbal or written safety procedures, (b) guidelines or rules, (c) horse play, (d) failure to wear or abuse of selected PPE, and (e) substance abuse.

10.1 Forms of Discipline.

10.1.1 Verbal Warning. The company safety officer and supervisory personnel in the administrative chain of any employee may give employees a verbal warning for a known unsafe act or procedural, or operational infraction. A second verbal warning in the same shift will be grounds for release from the current work shift without pay. The immediate supervisor will be consulted in all cases and will make the determination for release.

10.1.2 Written Warning. A written warning will be issued automatically for a second verbal warning for an unsafe act. The written warning will become part of the employee's permanent personnel record.

10.1.3 Retraining. It must be considered that the possibility exists that lack of proper training may be a cause of the unsafe act. Supervisors will review the need for employee remedial training in their job skill code to enable them to better accomplish their jobs.

10.1.4 Dismissal. Employee dismissal will be handled in a customary manner, through the administrative chain.

10.2 Unsafe Act Priority Classification System. Unsafe acts will be rated according to the following rating system. Where it is unclear where an unsafe act should be rated the next higher priority classification will be assumed. While any unsafe act is serious, this classification system will be used to gauge the severity of an unsafe act for use in determining the appropriate level of disciplinary action.

10.2.1 Priority 1 Unsafe Act. The most serious type of unsafe act or unsafe work practice that could cause loss of life, permanent disability, the loss of a body part (amputation or crippling injury), or extensive loss of structure, equipment, or material.

10.2.2 Priority 2 Unsafe Act. An unsafe act or work practice that could cause serious injury, industrial illness, or disruptive property damage.

10.2.3 **Priority 3 Unsafe Act.** An unsafe act or work practice that might cause a recordable injury or industrial illness or nondisruptive property damage.

10.2.4 **Priority 4 Unsafe Act.** A minor unsafe work practice infraction with little likelihood of injury or illness.