Kennedy Glass Partners LLC



"A window to SAFETY"



Prepared by: Kennedy Glass Partners LLC 2021 Kennedy Glass Partners, LLC. has a continuing commitment to the safety and welfare of its employees, customers and suppliers to provide a safe and clean workplace.

Our commitment is expressed and enforced by the actions of each of us. It is incumbent upon each of us to identify, address and correct any safety deficiencies prior to a costly accident wherever possible. The company President shall be notified of any safety problems or concerns as soon as they are identified. When it comes to the safety and wellbeing of the people associated with our company, everyone has equal responsibility. Employees are encouraged to say something if they foresee an issue.

While this manual provides instructions for meeting several safety requirements. It is not intended that this safety procedure manual be rigid, these rules are somewhat general and should be used in conjunction with more specific federal, state and local regulations. Whenever the two conflict, the more stringent regulations shall be applied. This information is provided in supplement to the requirements placed on us by; Occupational Safety & Health Administration (OSHA), US Army Corps of Engineers (USACE) and Insurance Carriers & Underwriters. All Safety ideas, concerns and comments should be given immediate attention and handled at the lowest level possible. At Kennedy Glass we use the phrase "A window to Safety" to remind our employees that safety should never be hidden from view.

Stefan Garrison,

President Kennedy Glass

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As of January 1, 2015:

All employers* must report:

 All work-related fatalities within 8 hours

Within 24 hours, all work-related:

- Inpatient hospitalizations
- Amputations
- Losses of an eye

How to Report Incident

- Call <u>1-800-321-OSHA</u> (6742)
- Call your nearest OSHA area office, during normal business hours (www.osha.gov/html/RAmap.html)

Safety Responsibilities

Management

- 1. Define the overall safety objective for the corporation.
- 2. Provide a safety budget and necessary funding to support the defined objectives.
- 3. Define responsibility for safety at all levels of the company.
- 4. Enforce the procedures and policies of the Safety Program.

Safety Official

The Safety Official reports directly to upper management and has received at least OSHA ten-hour training. They are responsible for the administration and implementation of the OSHA standards for the construction industry, 29 CFR Part 1926, as it applies to the company's construction projects. In addition, they shall administer the company safety program and see that it is put into effect and administered as outlined below:

- 1. Maintains the written Safety Program. As changes occur to the standards or policies, the Safety Director will publish and disseminate these policies to the field.
- Safety Training is a prime responsibility of this individual. They produce products and prepare the safety instruction for dissemination to employees. Some on site classes can be held with prior notice. They are responsible for training the Crew Leaders in safety and hazard recognition so that Crew leads in turn can go out and teach the field employees.
- 3. Conducts periodic inspections of project sites for compliance with the company written safety program. This individual has the authority to stop work when imminent danger violations are observed. Coordinates the site safety plan with other contractors or sub-contractors as necessary.
- Analyze safety statistics for trends for mishaps and accidents then provides management with analytical information and recommendations to eliminate or mitigate hazards.
- 5. Assist in solving operational safety problems by investigating available safety equipment and providing recommendations to crew leaders.
- 6. Ensures that all safety records are maintained (Minimum of five years) and the OSHA Form 300 is posted as required and distributed to each project as required.

Glazing Superintendent

The Glazing Superintendent is the primary link to the field employees for safety compliance.

- 1. The Glazing Superintendent is responsible for safety on all projects and will conduct his own safety inspections against the inspection policies contained in this program. He will take on the spot corrective action in all safety matters.
- 2. He ensures that the company safety program is carried out at the work level.
- 3. Makes sure no unsafe conditions or hazards exist.
- 4. Makes sure that necessary protective equipment is available and used properly.
- 5. Instructs all employees in safe procedures and job safety requirements. Follows up and insists on compliance.
- 6. Conducts "Toolbox Talks" and have personal contacts with employees on operations.
- 7. Sees that all injuries are treated properly and reported promptly as required by this program.
- 8. Trains personnel on project safety requirements.
- 9. Ensures that no one is assigned a task in which they have not been trained on the associated hazards.
- 10. Takes immediate action to correct any violation of the safety standards.
- 11. Ensures that equipment issued meets safety requirements, red tags, reports and replaces unsafe equipment and materials.
- 12. Has attended OSHA 10-hour training.

Crew Leader

- 1. The Crew Leader is responsible for knowing and following all company safety rules and policies established by this program.
- 2. Reports all known hazards and takes corrective action.
- 3. Knows what action to take in the event of an emergency.
- 4. Looks out for fellow workers and ensures they are free from hazards.
- 5. Uses all safety devices and personal protective equipment and instructs all personnel under his direction.
- 6. Is a safe workman on as well as off the job and provides the supervisory leadership to assure all personnel under his direction understands the safety requirements and follows the safety rules and policies.
- 7. Has attended OSHA 10-hour training.

Glaziers and General Laborers

1. The Glaziers and Laborers are responsible for knowing and following all

company safety rules and policies established by this program.

- 2. Knows what action to take in the event of an emergency.
- 3. Looks out for fellow workers and ensures they are free from hazards.
- 4. Uses all safety devices and personal protective equipment as directed by supervisor.

The primary objective of Kennedy Glass is to create a hazard free workplace with no accidents or injuries. To achieve these objectives certain goals must be established. These goals must be known to and understood by all employees. Safety should always be kept in mind as we approach our daily tasks, whether driving a company vehicle, working in the warehouse or plugging in office equipment.

Goals		
Goal Number One:	No lost time due to Accidents	
Goal Number Two: 7.5.	Maintain the OSHA Recordable Incident Rate (RIR) below	
Goal Number Three:	Reduce the Experience Modification Rate (EMR) Annually	

New Hire Orientation and Safety Training

New hire orientation training is conducted by Supervision for all employees prior to work. The orientation covers general company philosophy as well as specific safety awareness.

General training includes an overview of the President's statement on safety along with a discussion of responsibilities, discipline, substance abuses and hazards identification and reporting procedures.

Specific safety training includes at a minimum the following:

- 1) What to do if any emergency occurs.
- 2) What is a safety data sheet (SDS) and where are they located?
- 3) Personal Protective equipment (PPE) overview.
- 4) Bloodborne pathogens awareness.
- 5) Basic electrical safety.
- 6) General Safety Rules.
- 7) The written company Safety Handbook is given to all employees during the New Hire Orientation.

This training is documented along with the balance of the General Employee Orientation and filed in the Employee's personnel file.

Basic Employee Safety Rules

Responsibilities:

- 1. It shall be the responsibility of the company to initiate and maintain such programs as may be necessary to comply with requirements set forth by the Occupational Safety & Health Administration and any other local, state and federal regulations.
- 2. Frequent and regular inspections of the jobsite shall be made by a competent person or site safety representative designated by the company. Unsafe acts and/or conditions noted during inspections shall be corrected immediately.
- 3. The company shall instruct each employee on site in the recognition and avoidance of unsafe acts and/or conditions applicable to their work environment to control or eliminate injury or illness.
- 4. The company is responsible for providing and requiring the use of appropriate personal protective equipment in all operations where there is an exposure to hazardous conditions. All records shall be maintained at a location accessible to the employee. The employee is responsible to use protective equipment in compliance with instructions, OSHA regulations and good judgment.
- 5. The company is responsible for notifying employees of any material, chemicals, or hazardous substances used on a job site. The company shall provide employees with a copy of the Safety Data Sheet for the chemical or substance and the employee shall retain a copy of the material Safety Data Sheet on site for their own reference. The legal storage use and disposal of waste of any hazardous chemicals or substance is the responsibility of the employee, in compliance with instructions, OSHA regulations and good judgment.
- 6. The company is responsible for the development of a fire protection and prevention program confirming to OSHA and NFPA standards. The employee shall also comply with all fire and safety rules and regulations established on each project.
- 7. OSHA standards will serve as the minimum safety requirements for the project. Any site safety regulation which exceeds the minimum standards established by OSHA shall be incorporated in the individual project safety program.

Clothing Requirements:

- 1. Shirts shall be worn at all times.
- 2. Long pants are required.

- 3. Sandals, tennis shoes, or any other soft cloth shoe will not be permitted.
- 4. Loose fitting clothes or jewelry shall not be worn around moving machinery, grinding operations, etc.
- 5. Hair that could come in contact with or be caught in machinery shall be protected by a hard hat or hair net.

Personal Protective Equipment:

- 1. Approved hard hats must meet specifications contained in American National StandardsInstitute, **ANSI/ISEA Z89.1-2014**, shall be worn as required.
- 2. Proper eye and face protection shall be worn when engaged in such operations as welding, burning, chipping, grinding, handling chemicals and glass. Safety glasses with side shields will be the minimum type of eye protection. Certain areas may be made mandatory 100% eye protection due to current operations. Eyeglasses designed for ordinary wear do not provide the level of protection necessary to protect against workplace hazards, and face shields or other coverings shall be worn in accordance with 29 CFR 1910.133.
- 3. OSHA approved hearing and respiratory equipment shall be worn when required. The selection, fitting and maintenance requirements of OSHA 29 CFR 1926.101 shall be met as a minimum.

Signs, Signals and Barricades:

- 1. Signs, signals and barricades shall be visible at all times where a hazard exists.
- 2. Signs, signals and barricades shall be removed when the hazard no longer exists.

Rigging Equipment:

- 1. Rigging equipment shall be inspected by a designated, competent employee prior to initial use on the project and monthly thereafter to ensure that it is safe. Records shall be kept on site of each of these inspections by the employee.
- 2. Damaged rigging equipment shall be removed from service immediately. (Reference FALL protection policy) 1926.104.

Equipment and Motor Vehicles:

- 1. All equipment and motor vehicles must be inspected daily before use by the operator. Formal inspections must be made at 30-day intervals with proper documentation maintained on site by the company and copies shall be made available upon request to the employee. Equipment inspection forms should be kept by the designated safety personal.
- 2. Defective equipment shall be repaired or tagged as defective removed from service immediately.
- 3. All cracked and broken glass shall be replaced before bringing vehicles on the job

site. If glass is broken or damaged on site and if damage is severe enough to cause a potential safety problem, the machine will be stopped until such damage has been repaired.

4. Vehicles used to transport employees shall have seats firmly secured and all passengers should be properly seated and belted. Standing on the moving vehicle is prohibited. Use of seat belts is mandatory, if it doesn't have a seatbelt it isn't a seat.

Housekeeping:

- 1. During the course of construction, all debris and scrap material shall be kept away from the work area.
- 2. Containers shall be provided by Kennedy Glass for the collection and separation of waste, trash, oily and used rags, and other refuse.
- 3. Garbage and other waste shall be disposed of at frequent and regular intervals, in a manner approved by Kennedy Glass Partners, LLC

Medical Services

At Kennedy Glass we are not medical personnel and do not treat, consult or diagnose medical conditions professionally. Crew leaders should take time prior to arrival on a work site to know where the closest level one trauma center as well as approved physician or hospital emergency room is and should always have access to a cellular phone to call 911. Kennedy Glass will utilize Workplace Occupational Wellness as its Medical Provider.

Prior to commencement of work at the project, make a plan for prompt medical attention in case of serious injury. Knowing what to do before an accident can save time and possibly a life. Ensure that on hand first aid supplies approved by the Red Cross are easily accessible and adequate in number when required for minor wounds such as cuts and scrapes etc.

First aid kits shall be in a weatherproof container with individually sealed packages for each type of item. Telephone numbers and addresses of physicians, hospital and ambulances shall be maintained by office personnel and available to field by cell phone.

Complete and retain on file all "Employer's First Report of Injury" and OSHA form 300 and provide upon request. Accurate record keeping must be kept on all employees requiring first aid treatments by the designated safety director.

If Emergency Medical Technicians (EMTs) are not within close response time to the jobsite (usually 6 minutes or less). There must be a currently certified (American Red Cross or equal) first aid trained person on all jobsites at all times. On large sites there must be one for each 25 employees. Crew leaders shall have the medical care location listed with the Emergency phone numbers for the project, and maps or directions available upon request and completed before work begins.

The primary First Aid Station will be established prior to work commencement. Additional stations can be set up on large sites as needed. Signs and posters will be used to clearly mark each station. Each station will be kept supplied at all times, and the Superintendent will be sure that supplies are checked as often as needed, and at least weekly.

On large sites it may be necessary to plan a way to alert First Aid responders, so they can react to emergencies. The Project Manager will assist as needed. At no time will an injured person be allowed to drive themselves to the medical care location.

Emergency service phone numbers will be clearly posted at each First Aid Station.

In the event of an emergency while on site, the employee should sound the truck horn to alert the others immediately. Any employee who is injured on the job will be required to receive treatment from this provider. Employees who do not initially receive medical treatment from the designated medical provider may be subject to disciplinary actions.

On jobs that are outside the Workplace Occupational Wellness area, another medical provider will be designated that is close to the job site. The Operations Manager will be responsible for selecting the medical provider and informing the Job Superintendent and Foreman. The name, address and telephone number of the designated medical provider will be posted at all jobsites.

EMERGENCY FIRST AID INSTRUCTIONS

Bleeding and Wounds:

- Control bleeding by applying direct pressure with sterile dressing on wound.
- Clean minor injuries with soap and water after washing your hands and apply dry sterile dressing/bandages.
- If bleeding continues, apply additional sterile dressing and treat for shock. Use

disposable gloves & other personal protective equipment Breathing

Emergency:

- Call 911. Take all directions from 911 operators!
- Tilt head back, look-listen-feel with your ear near victim's nose and mouth for air exchange from victim's nose and/or mouth.
- If not breathing pinch nose and make a tight seal over victim's mouth with your mouth and give 2 breaths. (Adult-breathe once every 5 seconds)
- Continue until medical help arrives.

Burns:

- Remove person from the source of the burn.
- Immerse burned area under cool running water.

- For deeper tissue destruction, immerse burned area under cool water until pain is relieved. Apply a dry loose sterile dressing. Seek medical help.
- For electrical burns, cover with dry sterile dressing. Seek medical help.
- Watch for signs of shock.

Fractures, Dislocations, Sprains or Strains:

General care includes following R.I.C.E.

- Rest-Do not move or straighten the injured area.
- Immobilize-Stabilize the injured area in the position found. Splint the injured part ONLY if the person must be moved.
- **C**old-Apply ice to the injured area for 20 minutes. Place a thin barrier between the ice and bare skin to ensure it does not cause more pain.
- Elevate NOTE-Do not elevate the injured part if it causes more pain.
 - Call 911.
 - If an open fracture is present, apply sterile dressing around the open fracture as would for an embedded object. Bandage the dressing in place around the fracture.
 - Monitor and watch for signs of shock.

Heart Attack

Symptoms: Persistent chest pain or pressure, chest pain spreading to shoulders, neck, jaw or arms, trouble breathing or shortness of breath, nausea or vomiting, dizziness, lightheadedness or fainting, pale, ashen (grayish) or bluish skin, sweating and denial of signals.

- Call 911.
- Have victim rest in comfortable position. Loosen tight clothing.

• Closely watch the person until the emergency medical services (EMS) arrives. Comfort the person. Try to obtain information about the person's condition.

- Assist with medication, if prescribed. Offer an aspirin if medically appropriate. Do not give aspirin if the person is allergic to aspirin, has a stomach ulcer, taking blood thinner or has been told not to take aspirin by their doctor.
- Be prepared to do CPR if you are trained.

Heat Related Emergencies:

Heat Exhaustion:

Symptoms: Cool, moist, pale, ashen or flushed skin, headache, nausea, dizziness, weakness, exhaustion and heavy sweating. *Heat Stroke:* Symptoms: Red, hot, dry skin, changes in level of consciousness and vomiting.

- Remove from heat.
- Loosen tight clothing. Remove perspiration-soaked clothing.
- Apply cool, wet towels to skin. Fan the person.
- If conscious, give small amounts of cool water.
- If the person refuses water, vomits, or starts to lose consciousness: Call 911, place on his or side, continue to cool the person and monitor the person's breathing, and signs of life (coughing or movement in response to rescue breaths or pulse).

Hypothermia:

- Remove from the cold to a warm environment.
- Monitor airway, breathing and circulation.
- Give rescue breathing or CPR-if needed and if trained in CPR.
- Remove any wet clothing. Dry the person and wrap in blankets. If alert, may give small amounts of warm water.
- If not improving, seek medical help.

Poisoning:

Any substance that can cause injury, illness or death when introduced to the body.

- Call poison control center at 1-800-222-1222.
- If person is unconscious, level of consciousness changes or becomes lifethreatening, call 911.

Stroke:

Sudden signals of a stroke, Think F.A.S.T.

- Face-Weakness on one side of the face. Ask victim to smile.
- Arm-Weakness or numbness in one arm. Ask victim to raise both arms.
- Speech-Slurred speech or trouble getting the words out.
- Time-Note time first observed and call 911.

Shock

Symptoms: Restless or irritability, altered level of consciousness, nausea or vomiting,

rapid breathing or pulse, pale, cool, moist or ashen skin and excessive thirst.

- Call 911.
- Continue to monitor the person's ABC (airway, breathing and circulation).
- Control any external bleeding.
- Keep the person from getting chilled or overheated.
- Elevate the legs 8 to 12 inches if a head, neck or back injuries or if broken bones of the hip or legs is not suspected.
- Comfort and reassure until help arrive.

Conscious Choking:

If a conscious adult or child cannot speak, cough or breathe.

- Call 911.
- Place your arm across the victim's chest. Lean them over and do 5 back blows with the palm of your hand between their shoulder blades.
- Stand behind the victim and do 5 abdominal thrusts just above the victim's belly button in an upward motion.
- Continue back blows and abdominal thrusts until: The object is forced out; person can breathe or cough or becomes unconscious.

KENNEDY GLASS Report of Injury / Illness

ADDRESS:	
NAME OF INJURED PERSON:	
OCCUPATION:	
WHAT WAS EMPLOYEE DOING	AT TIME OF INJURY:
DESCRIPTION OF ACCIDENT:	
NATURE AND EXTENT OF INJU	RY:
DATE OF ACCIDENT:	TIME OF ACCIDENT:
UNSAFE CONDITION OR ACT: _	
FUTURE OCCURANCE PREVENT	ΓΙΟΝ:
REPORT/INVESTIGATION COM	IPLETED BY:
:	

Returning Injured Workers to Work

We have always cared about our workers and want them to return to work as quickly as possible after an accident. We feel this is best for the individual and the company.

Kennedy Glass will make every effort to offer light duty to employees when specified by the attending physician. We make sure any clinic we send an injured worker to understands this is our policy. Many doctors will tell a patient to stay of work; not realizing the company intent to honor restricted duty. Thus, the worker loses pay and the company loses production. To help with light duty assignments for the employees, they are required to provide written restrictions from the doctor.

Any person sent back to work with light duty classification will be given light duty work. Any deviation from this policy must be discussed with the project manager and the company president as well as the attending physician.

Transitional Work Program - Restricted Duty Procedures

A. Program Goals

- 1. To protect the health and safety of all employees.
- 2. To prevent lost time accidents.
- 3. To return injured employee in a timely and safe manner.

B. Criteria for Entry

- 1. If an employee is injured on the job and the injury prevents the employee from performing the full range of responsibilities for an undetermined, but temporary period of time.
- 2. Employee must accept the position that is offered by KENNEDY GLASS. Employee does have the right to refuse the position or work. If refused, no other positions or work will be made available for their employment until they are released back to full work duty by the doctor or physician.
- C. Determined Work Capabilities or Restrictions

Each employee must have a statement from their attending physician or doctor defining the restrictions to be followed and the estimated length of time they may affect.

D. Employee General Information

- 1. All time must be recorded as light duty.
- 2. Full wages will be paid, with benefits based on hours worked.
- 3. Wages will be paid according to employee agreement for any further medical treatments or doctor's appointments scheduled during working hours. If these treatments or appointments are not available during non-working hours, the job Superintendent is authorized to approve pay for working hours lost, obtaining such treatments on a case-by-case basis, upon submission of confirming evidence.
- 4. Employees entering this program are expected to be always productive in their modified duty assignments and perform equal to that of their co-workers.
- 5. Employees in this program will not be assigned to duties involving scheduled overtime work.

Substance Abuse Policy

Policy Explanation

Kennedy Glass is committed to providing for the safety of our Employees, Customers, and the general public. We expect our employees to report to work physically and mentally fit for work. It is our desire, intent and obligation to provide a drug-free work environment. This policy is intended to address Substance Abuse, which may impact the health of our employees and their dependents, the quality and productivity of our work, our public liability and legal or contractual requirements.

Substance Abuse Behaviors Prohibited

The unlawful distribution, possession or being under the influence of alcohol and any illegal substance on Company premises (including Company vehicles), or while conducting Company business off premises is prohibited. Possession of paraphernalia used in connection with any drug or substance subject to this policy shall be evidence of violation of this policy.

Consequences of Violation

Any employee who is arrested for possession, selling or using illegal drugs while off duty will be discharged. The use of Alcohol or illegal drugs during work hours as confirmed by possession or confirmation testing will result in immediate discharge with no chance for rehire and may have legal consequences. A positive drug screen at any time will result in disciplinary action, up to and including discharge. A positive drug screen after a negative "Return to Duty" screen will result in discharge.

Screening and treatment Preemployment Screen

All applicants for positions must receive a verified negative drug screen through an approve NIDA laboratory before working with Kennedy Glass Partners, LLC

Post-Accident Screen

Kennedy Glass Partners, LLC requires a drug screen for any employee who has been injured or involved in an accident on a case-by-case basis.

Reasonable Cause Screen

When a supervisor decides to conduct a "Reasonable Cause Test" based on the belief that an employee is using a prohibited drug, he/she must submit to a drug and/or alcohol

screen.

Return to Duty Testing

A "Return to Duty" test must be conducted and a verified negative test result received before an individual is returned to duty after receiving verified positive test results. All employees who test positive must submit to an assessment from a Substance Abuse Professional (SAP) before submitting to a return to duty test.

Follow-up Testing

A program of unannounced follow-up drug and or alcohol testing must be implemented for each person who has completed a negative return to duty test. At least 6 follow-up tests are to be conducted at the employee's expense within the first 12 months after an individual returns to duty.

Employee Assistance

The company recognizes substance abuse as a potential illness and a major health problem. We are committed to maintaining confidentiality. Information regarding community assistance and/or other help programs can be obtained from the President or Operations Manager. Conscientious efforts to seek such help will not jeopardize an employee's job and will not be noted in any personnel record.

Alcohol and Drug Abuse Policy Employee Verification Form

CONSEQUENCES FOR VIOLATION OF POLICY

- 1. Violation of the corporate alcohol and drug policy may result in severe disciplinary action, including discharge, at the Contractor's sole discretion.
- 2. In addition to any disciplinary action, the Contractor may, in its sole discretion, refer the employee to a treatment and counseling program for alcohol or drug abuse. Employees referred to such a program by the Contractor must immediately cease any alcohol or drug abuse and may be required to subject themselves to periodic unannounced testing for a determined period of time and must comply with all other conditions of the treatment and counseling program. The Contractor shall determine whether an employee referred for drug or alcohol treatment and counseling should be temporarily reassigned to another position.

EMPLOYEE CONSENT

I have carefully and thoroughly read the corporate alcohol and drug abuse policy. I agree, without reservation, to comply with that policy.

Name

Date

Job Hazard Analysis

The purpose of the Hazard Analysis is to provide a method for supervisors or crew leaders to evaluate upcoming work, identify potential hazards related to that job, and to develop a Safe Work Plan for completing the work prior to beginning.

Prior to starting work, the Glazing Superintendent, in conjunction with the assigned Crew Leader, shall complete an evaluation of the work to identify potential hazards specific to the upcoming job. The results of this evaluation shall be documented on the Job Hazard Analysis **SITE SAFETY FORM** form.

The evaluation shall include:

- 1. Potential hazards
- 2. Personal protective equipment requirements
- 3. Any special requirements to protect worker safety.

It is each employee's responsibility to ensure that the Safe Work Plan for the job is completed. The Crew Leader shall review the Job Hazard Analysis, which serves as the Safe Work Plan, with each crew member. Each crew member shall sign the form, acknowledging that he or she understands the plan and is prepared to accomplish the work in an efficient and safe manner.

Self-Inspection

Site safety inspections shall be conducted no less than once per month by the Safety Director, or an appropriate designated. These inspections may take place on work sites and/or within Kennedy Glass facilities.

Site safety inspections shall evaluate:

- 1. Personnel for safe work practices and proper use of personal protective equipment
- 2. Equipment for proper maintenance and safe operating condition
- 3. Site conditions which are appropriate, marked, and maintained clutter free.
- 4. Materials for proper identification and storage
- 5. Documentation, including work plans and job hazard information.

Upon completion of the inspection, the inspector will complete a Self-Inspection Report, including findings as well as corrective action required. This document shall be distributed to the Operations Manager and Crew Leader, so that they may see to any necessary corrective action. A copy of the form and correction should be kept by the safety official.

Site Safety Audit Form

Project: _____Date: _____

Location:

Superintendent:

A - Indicates Attention Needed X - I	ndicates Acceptable N/A – Not Applicable			
OSHA Safety & Protection Poster	Electrical Hazards / GFCI			
Emergency Phone numbers posted	Competent Person on Site			
First Aid Kit & Supplies	Scaffold / Lifts			
Adequate posters & warning signs	Ladders / Stairs			
Hazard Communication Info. Posted	Barricades / Guard Rails			
Housekeeping	Fall Protection			
PPE - Hard Hats	Confined Space			
PPE - Hearing Protection	Container Labeling			
PPE - Eye & Face Protection	Power Tools / Extension Cords			
PPE - Respiratory Protection	Hand Tools			
Are personnel wearing appropriate PPE	Excavations / Trenches			
Tool Box Meetings being conducted	Material Storage			
Fire Extinguishers	Heavy Equipment			
Proper Storage of Flammable Liquids	Safety Attitude			

Notes:			

Inspection by:

Jobsite Inspection Checklist

Inspected by:					
Comp	any/Project name:				
Number of Employees:			Сор	y provi	ded to:
1.	Site Access Clean & Level ground Adequate ramps <u>ect</u> . Stairs Adequate and clear	ок □ □	Not OK	NA □ □	Corrective Action Taken
	Ladders Adequate and clear				
2.	Protective Equipment (PPE) Hard Hats accessible and worn Fall Protection worn				
	Protective clothing Eye and Face protection Hearing Protection Respirators, ventilation				
3.	Guardrails/ barricades Location in needed/ required Constructed properly Secured adequately				
-	Secure Angle/ base distance (extensions) Size and type for the job Usability (Not Damaged or broken) Handrails and landings Non-slip base attached				
5.	FIFE SATELY Extinguishers when required Extinguishers charged Emergency Evacuation plan Exits clearly marked				

Elevated Platforms/Aerial Lifts

Elevated platforms and aerial lifts shall only be used by qualified personnel. Kennedy Glass leases this equipment and uses the lease provider to conduct individual employee training, either on the job site or at the equipment provider's location. This formal training includes both operation and equipment safety. Once this training is completed, each participant is provided with a certificate of completion and an operator's card and is logged into the Kennedy Glass employee certification information system.

Elevated platforms and aerial lifts shall be inspected daily before use to assure that all safety guards and rails are in place and are not damaged or compromised in any way.

Prior to use for production, equipment shall be tested to ensure that all operations are working as intended:

- 1. Lowering and raising
- 2. Moving and braking
- 3. Audible alarms

Safety harnesses and lanyards shall be used at all times when operating and working from this equipment. Please reference the Fall Protection Policy section of this Safety Manual for more information.

Overhead Crane Operations

Purpose

The purpose of this program is to outline the procedures for safe operations and the training requirements regarding crane and lifting devices, including all rigging is designed, constructed, installed, maintained and operated to perform safely.

Scope

This program is applicable to all employees who may utilize cranes and lifting equipment.

It applies to all employees who operate overhead cranes, hoists, and rigging equipment in the scope of their job duties and assignments. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

Managers and Supervisors

- For ensuring only trained personnel operate the equipment.
- Establish and maintain a daily, monthly and annual inspection program.
- Establish a recordkeeping log for safety checks, maintenance and repairs.
- Are responsible to ensure that employees and contractors are trained and qualified on the proper operations and have been trained in rigging safety by a competent person. Modifications or additions which affect the safe operation of the equipment may only be made with the manufacturer's written approval.
- Are responsible to see that all provisions of this program are followed and that rigging inspections are performed, and the equipment is in safe operating condition.

Employees

- Personnel are responsible for visually checking the equipment they are using and reporting any observable wear, needed repairs or damage to their supervisor. They shall also report all equipment malfunctions immediately.
- Employees are responsible to follow the requirements of this program.

Procedure

Operating controls shall be plainly marked to indicate the direction of travel.

All manufacturer procedures applicable to the operational function of equipment must be complied with. All manufacturer procedures applicable to the operational functions of equipment, including its use with attachments, must be complied with.

Procedures applicable to the operation of the equipment be readily available at all times. The operator shall have access to procedures applicable to the operation of the equipment. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.

Operator Qualification

Operators must be determined to be qualified before they are permitted to operate any crane. Only those employees qualified by training or experience shall be allowed to operate equipment and machinery. As of 2010 employers must ensure operators be qualified/certified by one of the following methods:

- Certification by an accredited crane operator testing organization.
- Qualification by an audited employer program

- Qualification by the U.S. military
- Licensing by a government entity

Load Chart

Each hoist shall have a legible load chart showing the rated capacity in all permitted working positions and configurations of use, manufactures name, model, serial number and year of manufacture or shipment date permanently marked or noted clearly, permanently posted on the equipment, weatherproofed and conspicuous on the equipment and shall be kept legible at all times. The load chart will be issued to the equipment operator, who must have it available at all times when operating the equipment.

Modifying Equipment

Modifications or additions that may affect the capacity or safe operation of the equipment must not be made without written approval from the manufacturer or approval from a registered professional engineer. The manufacturer must approve all modifications/additions in writing. A registered professional engineer must be qualified with respect to the equipment involved and must ensure the original safety factor of the equipment is not reduced.

Prior to Lifting

Cranes must not be used unless ground conditions are able to support the equipment and any supporting materials per the manufacturer's specifications. Equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer's specifications for adequate support and degree of level of the equipment are met.

All loads shall be hooked or slung under the direction of a competent employee.

Prior to operating any equipment, the operator must be familiar with all recent entries in its log book.

The operator must carry proof of training.

Before the start of each shift or use an operator uses a crane or hoist, the operator must inspect the crane or hoist was inspected for that work shift, and the control and safety devices were tested for that work shift to detect any defect, malfunction or hazardous condition. All safety devices must be in proper working order before operation begins. Safety devices are required to be on all equipment and must be in proper working order before operations begin. If any of the devices are not in proper working order the equipment must be taken out of service and operations must not resume until the device is working properly again. Examples of safety devices may include crane level indicator, boom stops, jib stops, foot pedal brake locks, horns, etc. A fire extinguisher must be immediately available in the cab of each crane or other hoisting equipment.

The operator has the authority to stop and refuse to handle loads whenever there is a safety concern. Whenever there is a safety concern, the operator must have the authority to stop and refuse to handle loads until a qualified person has determined that safety has been assured.

When the operator of a crane or hoist does not have a clear and unobstructed view of the boom, jib, load line, load hook and load throughout the whole range of the hoisting operation, the operator must act only on the directions of a qualified, designated signaler who has a clear view of the things the operator cannot see. The operator of the crane or hoist must stop the operation of the equipment on receiving a stop signal from any person.

Operators of hoisting equipment shall disregard signals from anyone except designated signal persons but in an emergency other employees may give a stop signal.

Where the design of a crane is such that the boom may fall over backward, positive boom stops shall be installed in accordance with the manufacturer's instructions.

No employee shall ride or be permitted to ride on loads, hooks or similar equipment unless specifically authorized by his or her supervisor.

Marking Boundaries

CONTRACTOR must address safety measures to be used when the equipment has the potential to strike and injure an employee or pinch/crush an employee against any other object. CONTRACTOR identifies hazard areas by marking the boundaries of the crane swing radius with warning lines, railings or similar barriers. Employees or other persons are not allowed within the barrier when operations are taking place. The crane will immediately be required to stop movement if someone enters the swing radius area.

Overhead Power Lines

A pre-operation hazard assessment will be performed to identify the work zone and determine if any part of the equipment could reach closer than 20 feet to a power line. The work zone shall be identified by demarcating boundaries such as flag and range limiting devices or defining the work zone as 360 degrees around the equipment up to the maximum working radius. The hazard assessment must determine if any part of the equipment could get closer than 20 feet to a power line.

CONTRACTOR will ensure measures must be taken if determined that any part of the

equipment, load line or load could get closer than 20 feet to a power line. If it is determined that any part of the equipment, load line or load could get closer than 20 feet to a power line then at least one of the following measures must be taken:

- Ensure the power lines have been deenergized and visibly grounded.
- Ensure no part of the equipment, load line or load gets closer than 20 feet to the power line.
- Determine the line's voltage and minimum approach distance permitted in Table A below.

Voltage	Minimum Clearance Distance
(nominal, kV, alternating	(feet)
current)	
up to 50	10
over 50 to 200	15
over 200 to 350	20
over 350 to 500	25
over 500 to 750	35
over 750 to 1,000	45
over 1,000	(as established by the utility owner/operator or
	registered professional engineer who is a qualified
	person with respect to electrical power transmission
	and distribution).

TABLE A—MINIMUM CLEARANCE DISTANCES

Note: The value that follows "to" is up to and includes that value. For example, over 50 to 200 means up to and including 200kV.

Assembling/Disassembling Equipment

The manufacturer instructions and prohibitions must be followed when assembling and/or disassembling equipment. The manufacturer's procedures and prohibitions must be complied with when assembling and disassembling equipment.

A competent and qualified person must direct the assembly/disassembly of equipment. CONTRACTOR will ensure the assembly/disassembly of equipment must be directed by a competent and qualified person.

Handling the Load

<u>Size of Load</u>

The rated capacity of a crane or hoist must not be exceeded, except for rated load test.

The working load shall not be exceeded and shall be determined by the original manufacturer of the equipment, a registered professional engineer, or other persons whose qualifications are acceptable to local regulatory requirements.

Attaching the Load

- The load shall be attached to the hook by means of slings or other suitable and effective means which shall be properly rigged to ensure the safe handling of the load.
- Chain and rope slings shall be free of kinks or twists before use.
- Baskets, tubs, skips or similar containers used for hoisting bulk materials shall be loaded so as not to exceed their safe carrying capacity.
- The hoist rope shall not be wrapped around the load.
- The load shall not be moved without checking the balance and the brakes. Brakes are checked by raising the load a few inches and applying the brakes.

Load Lifting Manual

Safe lifting procedures can be found in the Lifting Handbook located in the operations office as designated for each work site by the Manager.

Safe Lifting

- If the operator of a lifting device has any doubts as to the safety of employees in the vicinity of the lift, the operator must not move any equipment or load until the operator is assured that the working conditions are safe. He or she shall report the circumstances to his or her supervisor who then shall be responsible for determining the action to be taken.
- Loads will be carried as close to the grade as possible and tag lines shall be rigged as necessary to control swinging of the load.
- Prior to moving a load ensure that the travel path of the load is free and clear of any undesirable obstructions.
- A suspended load shall not be left unattended by an employee.
- Ensure all employees who may be affected by the lift are aware of the hazards and are adequately protected.
- CONTRACTOR must ensure that work is arranged, if it is reasonably practicable, so that a load does not pass over employees. An operator of a lifting device must not pass the load on the device over employees unless no other practical alternative exists in the circumstances and the employees are effectively warned of the danger by an audible alarm or other effective means. The operator of a lifting device that is travelling with a load must ensure that the load is positioned as close to the ground or grade as possible.

- A person working at a workplace must not stand or pass beneath a suspended load unless the employee has been effectively warned of the danger and the operator of the lifting device knows the employee is under the suspended load.
- Release the load only after the stability of the load has been verified and loads shall be safely landed and supported before unhooking.

If a hoist or crane is designed to be operated with outriggers or other stabilizing devices employees shall ensure:

- The outriggers or other stabilizing devices are used in accordance with manufactures instructions.
- Are set on a solid footing or pad.
- Have their controls if any readily accessible to the operator and in a suitable position for safe operation.
- The area around the outriggers or other stabilizing devices is kept free of obstruction.
- There is a proper minimum clearance between any moving part of the crane and any obstacle near the base of the hoist or crane.
- Where there is a danger of an employee being trapped or crushed by any moving part of the crane when the crane swings, the area around the base of the crane is barricaded to restrict the entry of employees.

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Logbook Procedure

The logbook will be readily available at all times to the operator and to another employee concerned with the maintenance and safe operation of the equipment. The operator shall be responsible for recording defects, operating difficulties, the need for maintenance and all maintenance and alteration work performed. If the operator requests, they shall be given a copy of the log book.

The logbook for the equipment at a project shall include the greater of the immediately preceding twelve months or the period the crane or similar hoisting device is on the project.

When not being operated the logbook will be located in the designated space for each piece of equipment.

All logbook entries shall, on a regular basis, be signed by the person who performs the inspection, maintenance or calibration and review.

The logbook will include the following information:

- The date and time any work was performed on the hoist.
- Length of time in lifting service including hours of service.
- All defects and deficiencies and when they were detected.
- Details on all inspections, examinations, calibrations, checks and tests.
- Repairs or modifications performed or maintenance history.
- The record of certification.
- Details on any incident that may affect the safe operation of the equipment.

Inspections

Each crane and hoist must be inspected and maintained at a frequency and to the extent required to ensure that every component is capable of carrying out its original design function with an adequate margin of safety and is maintained in good working order. Inspections shall also be conducted at regular intervals as recommended by the manufacturer and by law.

Records of inspection and maintenance must be kept by the equipment operator and other persons inspecting and maintaining the equipment, for the following types of lifting equipment:

- A crane or hoist with a rated capacity of 900kg (2200 lbs.) or more
- A crane or hoist used to support an employee.
- A tower crane.
- A mobile crane, boom truck or sign truck
- A side boom tractor or pipe layer
- A construction material hoist
- A chimney hoists.

The following inspections shall occur at the indicated frequency:

<u>New Equipment</u>

Before being placed in service, new hoisting equipment, or hoisting equipment which has had modifications in the design or has undergone major repairs, shall be inspected and proof tested under the direction of a competent person who shall give the written warranty of the safe capacity of the equipment.

<u>Daily</u>

A visual inspection of the equipment will be conducted by a competent person prior to each shift. A competent person must conduct a visual inspection of equipment prior to each shift. The inspection must consist of observation for apparent deficiencies. Some inspection items shall include control mechanisms, pressurized lines, hooks and latches, wire rope, electrical apparatus, tires (when used), and ground conditions. The manufacturer's guidelines shall be followed. The following will be tested at the beginning of each shift by the competent operator:

- Limit switches
- Brakes
- Circuit breakers
- Other safety devices

Any defects found during inspection or use of a crane or hoist must be recorded in the inspection and maintenance record system and be reported immediately to the supervisor, who must determine the course of action to be taken. If a defect affects the safe operation of the crane or hoist, the equipment must not be used until the defect has been remedied.

<u>Monthly</u>

Ensure monthly inspections of equipment by a competent person are documented. Equipment must be inspected monthly by a competent person. The manufacturer's guidelines shall be followed. The inspection must be documented and maintained by the Safety official. Documentation must include the following:

- items checked,
- results of inspection,
- name and signature of the inspector.

Documentation must be retained for 3 months. (Documented monthly inspection is not required if the daily inspection is documented and records are retained for 3 months).

Any defects must be corrected before the crane is used. The report must be dated and signed by the person performing the inspection.

<u>Yearly</u>

Once each year a more detailed inspection must be made of all hoisting equipment at each facility. After completing the annual inspection, a report must be completed and signed by the person performing the inspection and the report will be returned promptly to the Safety Manager.

Rigging

All rigging work shall be assembled, used, maintained and dismantled under the direct supervision of a competent and qualified employees trained in safe rigging practices, in accordance with manufacturer's specifications and with the code of signals authorized by local regulatory guidelines for controlling hoisting operations.

Rigging Breaking Strength and Load Rating

The safe working-load on ropes, chains, slings and fittings shall not exceed the safe

working load recommended by the manufacturer.

Rigging fittings must be marked with the manufacturer's identification, product identifier and the working load limit (WLL) or sufficient information to readily determine the WLL. The WLL of existing fittings not identified must be determined by a qualified person, marked on the fitting and such fittings must be removed from service by January 1, 2001.

Rigging shall not be subjected to a load of more than 10 percent of the breaking strength of the weakest part of the rigging, if an employee is being raised or lowered 20 percent of the ultimate breaking strength of the weakest part of the rigging, and if the rigging is fatigue rated and an employee is not being raised or lowered the maximum load must not exceed 25 percent of the ultimate breaking strength.

Employee may use a dedicated rigging assembly designed and certified for a particular lift or project by a professional engineer, but the dedicated rigging assembly must be re-rated before it is used for another lift or project.

The maximum load rating of the rigging, as determined by the rigging manufacturer or a professional engineer must be legibly and conspicuously marked on the rigging. If it is not practicable to mark the rigging the maximum load rating of the rigging must be available to the employees at the work site.

Rigging Inspection and Rejection Criteria

All rigging and rigging equipment to be used during a work shift is to be inspected thoroughly prior to each period of continuous use during the shift to ensure the rigging is functional and safe by a competent person. All deteriorated or defective equipment will be immediately removed from service if it does not meet the below inspection requirements or rejection criteria.

<u>Slings</u>

- A wire rope sling with a swaged or poured socket or a pressed fitting must be permanently identified with its working load limit, the angle upon which the WLL is based and the name or mark of the sling manufacturer.
- An alloy steel chain sling must be permanently identified with the size, the manufacturer's grade and the WLL, the length and number of legs, and the name or mark of the sling manufacturer.
- Synthetic fiber web slings must be permanently identified with the manufacturer's name or mark, manufacturer's code or stock number, working load limits for the types of hitches permitted, and type of synthetic web material or be removed from service if any of these requirements are not met.
- A sling shall be permanently removed from service if it is damaged or worn.
- All slings are to be clearly labeled to indicate the slings maximum load or the slings maximum load is made readily available to employees.
- All slings must be stored to prevent damage when not in use.
- When a sling is applied to a sharp edge of a load, the edge or the sling must be protected to prevent damage to the sling.

<u>Hooks</u>

- A worn or damaged hook must be permanently removed from service and CONTRACTOR shall not require or permit an employee to use a hook that is worn, damaged, deformed, cracked or otherwise defective or where the throat opening has been increased or the tip has been bent more than 10% out of plane from the hook body, or any dimension of the hook has been decreased by 10% or any damage exceeds any criteria specified by the manufacturer. <u>Note</u>: This is a higher standard than required is some locations.
- All hooks shall be clearly labeled with the maximum load of the hook in a location where an employee using the hook can easily see the rating or the hooks maximum load is made readily available to employees.
- A hook will have a safety latch, mousing or shackle if the hook could cause injury if it is dislodged while in use.

All devices shall be visually inspected prior to use and removed from service for any of the following conditions:

- Nylon slings with:
 - Abnormal wear.
 - Torn stitching.
 - Broken or cut fibers.
 - Discoloration or deterioration.
- Wire rope slings with:
 - Kinking, crushing, bird caging, or other distortions.
 - Evidence of heat damage.
 - Cracks, deformation, or worn end attachments.
 - Hooks opened more than 10% at the throat.
 - Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.
- Alloy steel chain slings with:
 - Cracked, bent, or elongated links or components.
 - Cracked hooks.

 Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

Operational Procedures

- Rigging shall not be subjected to loads more than outlined in legislative requirements. CONTRACTOR will ensure the maximum load rating of the rigging is available to the employees at the work site.
- Wire rope, alloy steel chain, synthetic fiber rope, metal mesh slings, and synthetic fiber slings shall meet the requirements of ASME Standard B30.9-2006, Safety Standard for Cableways, Cranes, Derricks, Hoists, Hooks, Jacks and Slings (or current version). Below-the-hook lifting devices, other than slings shall meet the requirements of ASME Standard B30.20-2006, Below the Hook Lifting Devices (or current version). Loads to be unhooked by an employee must be safely landed and supported before the rigging is detached.
- The determination of the working load limit (WLL) of a sling assembly must ensure that the WLL of any individual component of the assembly is not exceeded.
- All slings used to hoist a load and the slings fittings and attachments must be in compliance with legislated standards and capable of supporting at least 10 times the load to which the slings fittings, and attachments may be subjected where they are used to support an employee, and at least five times the maximum load to which they may be subjected in any other case.
- No shackles shall be subjected to a load greater than the maximum load indicated on the shackle, and all shackle pins are installed to prevent accidental withdrawal, and a bolt is never used in the place of a properly fitted shackle pin.
- All hooks shall have a safety latch, mousing, or shackle if the hook could cause injury if it is dislodged while in use.
- Where an employee may be endangered by the rotation or motion of a load during hoisting one or more tag lines must be used to control the rotation or motion of the load and the tag lines will be of sufficient length to protect the employees from any overhead hazard and the tag lines are not removed from the load until the load is securely landed.

Rigging a Load

- Determine the weight of the load do not guess.
- Determine the proper size for slings and components.
- Do not use manila rope for rigging.
- Ensure that shackle pins and shouldered eyebolts are installed in accordance with the manufacturer's recommendations.
- Ensure that ordinary (shoulder-less) eyebolts are threaded in at least 1.5 times the bolt diameter.

- Use safety hoist rings (swivel eyes) as a preferred substitute for eye bolts wherever possible.
- Pad sharp edges to protect slings.
- Remember that machinery foundations or angle-iron edges may not feel sharp to the touch but could cut into rigging when under several tons of load.
- Wood, tire rubber, or other pliable materials may be suitable for padding.
- Do not use slings, eyebolts, shackles, or hooks that have been cut, welded, or brazed.
- Install wire-rope clips with the base only on the live end and the U-bolt only on the dead end.
- Follow the manufacturer's recommendations for the spacing for each specific wire size.
- Determine the center of gravity and balance the load before moving it.
- Initially lift the load only a few inches to test the rigging and balance.

Signaling

A signal person must be provided if the operator's view is obstructed, if site specific safety concerns require it, or if the operator determines that it is necessary. A signal person must be provided for the following situations:

The point of operation is not in full view of the operator,

- The view is obstructed when the equipment is traveling, or
- The operator or the person handling the load determines it is necessary due to site specific concerns.

Signals to the operator shall be in accordance with the standard hand. Specific requirements include:

- Each movement of equipment shall be proceeded by distinctive signals clearly discernible to all employees endangered by the movement and clearly distinguishable by the operator of the equipment controlled, and a signal which is not understood clearly by the operator of equipment shall be acted upon by him or her as though it were a stop signal.
- An employee shall not cause a signal to be given for the movement of equipment unless he or she has ensured that he or she and all employees within the area for which he or she is responsible are not endangered by the movement.
- Only a designated employee shall cause a signal to be given for the movement of equipment, but employees may cause a stop signal to be given and this signal shall be obeyed promptly and without question.
- An employee designated to direct the movement of equipment shall not be otherwise occupied while the equipment is in motion and he or she shall be prepared to signal to stop during the motion.

- A signaling device that functions unreliably or in a way that might constitute a hazard to an employee shall be removed from service immediately.
- Signals shall be discernible or audible at all times.
- Some special operations may require addition to or modification of the basic signals.
- For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator and shall not be in conflict with the standard signals.

Training:

Training shall include:

- Documentation of employee, date of training and subject matter, including method used to test knowledge of material.
- No employee shall operate cranes or equipment covered by this program until training has been complete and management has approved and designated him or her as a qualified operator.

Aerial/Scissor Lifts

The supplier should provide the equipment's manual of operation where it should be placed into each lift when it is set up or brought onto the jobsite. Set up of man lifts must be supervised by the Superintendent.

Visual daily inspections are the responsibility of the operator. The equipment supplier will conduct the annual inspection/certification required by OSHA.

<u>Policy</u>

This section sets forth the requirements to protect employees and jobsite workers exposed to the hazards associated while utilizing aerial and scissor lift personnel platforms during the course of work.

<u>Scope</u>

This section covers the responsibilities, inspection procedures, personal protective requirements, and safety guidelines for any employee who works from or operates an aerial or scissor lift personnel platform.

Procedures

All operators and users of aerial platforms must display proficiency in knowledge and actual operation while operating or working from such equipment. Only trained and authorized employees shall be permitted to operate or use aerial platforms. Before authorizing an employee to operate an aerial platform, the Supervisor shall ensure that the employee has:

- 1. Been instructed by a qualified person in the intended purpose and function of each control.
- 2. Read and understood the manufacturer's operating instructions and users safety rules, or been trained by another qualified person on the contents.
- 3. Understood by reading or having a qualified person explains all the decals, warnings, and instructions displayed on the aerial platform.
- 4. Determined that the purpose for which the aerial platform is to be used is to be used within the scope of the intended applications for that specific aerial platform equipment.
- 5. Been provided with all fall protection devices and other safety gear for all employees in the platform.

Due to "Catapult Hazard" a PFAS is required on all lifts regardless of height!

- 6. Each lift will be visually inspected and properly maintained, and an **"Aerial/Scissor Lift Checklist"** which is located in the appendix section of this manual, should be completed and signed by the equipment operator before the start of each shift to ensure proper operation.
- 7. If any condition that would adversely affect the safe operation of the lift is noticed and cannot be properly abated, the condition will be noted on the checklist and the lift shall be immediately removed from service until the condition is properly repaired. A qualified person shall make all repairs to the aerial platform.
- 8. Inspection of the work area shall also be completed before using the aerial platform including but is not limited to the following:
 - a. Drop-offs or holes
 - b. Bumps and floor obstructions
 - c. Debris
 - d. Overhead obstructions and high voltage
 - e. Hazardous locations
 - f. Environmental conditions for the work area
 - g. Inadequate surface and support
- 9. All operators and users shall cease operation of the aerial platform in case of suspected malfunction(s) or any potentially hazardous condition(s) until proper repairs or abatements are completed.
- 10. Any employee, who enters an aerial platform with an extensible boom or platform, shall utilize a fall arrest harness and lanyard at all times, secured to the manufacturer's anchorage point, regardless of the working height. Platforms used for increasing working heights, that do not extend or boom outward, but remain over the base wheels at all times, do not require the use of a fall arrest harness, given the user(s) have their feet firmly positioned on the floor of the lift, and the guardrails and entry point door or chains are in use at all times. Belting off to adjacent structures is prohibited.
- 11. The aerial platform is operated on a surface within the limits of the equipment for safe operation.
- 12. Before each movement or when repositioning the aerial lift platforms, all operators shall ensure the following:
 - a. The outriggers, stabilizers, extendible, or stability enhancing item are used.
 - b. Guardrails are installed and access gates openings are closed.
 - c. The load and its distribution on the platform and any platform extension are

within the manufacturer's rated capacity.

d. The operator shall ensure the area surrounding the aerial platform is clear of personnel and equipment before raising or lowering the platform.

e. There is adequate clearance from any overhead obstructions. This includes a minimum distance of 10 feet from all power lines. For work closer than this 10-foot radius, all power lines must first be de-activated and tagged out of service.

f. The path of travel has been visually inspected and will properly balance and support the aerial platform.

- 13. All aerial platform equipment operated in hazardous locations shall be of the approved type. Employees shall utilize personal protective equipment (i.e., face shields, safety glasses, dust masks, etc.) as required while working from or operating aerial platforms equipment.
- 14. When other moving equipment, motor vehicles, other orders or the general public are present, special precautions for warning others with flagging, roped off areas, flashing lights, and\or barricades shall be installed as needed.
- 15. The aerial platform shall not be operated from a position n trucks, trailers, railway cars, floating vessels, scaffolds, or similar equipment unless approved by the manufacturer.
- 16. Under all travel conditions, the operator shall limit travel speed according to conditions of the ground surface, congestion, visibility, slope, location of personnel, and other factors causing hazards of collision or injury.
- 17. Altering or disabling safety devices or interlocks is strictly prohibited. All modification or alterations of an aerial platform shall be made according to the manufacturer's specifications and approval.
- 18. Rated capacities shall not be exceeded when loads or personnel are transferred to the platform at any height.
- 19. Aerial platforms should not be used in high winds or gusty conditions.
- 20. The aerial platform shall not be positioned against another object to steady the platform.
- 21. The aerial platform shall not be used as a crane.

- 22. Care shall be taken to prevent rope, electrical cords and hoses from being entangled with the aerial platform.
- 23. Stunt driving and horseplay shall be strictly prohibited.
- 24. Personnel shall maintain a firm footing on the platform while working therein. Use of planks, ladders, or any other makeshift devices for achieving additional working heights or reach shall be strictly prohibited.
- 25. Do not sit or stand on the guardrails of an aerial platform at any time. Guardrails are rated for 200-pound maximum loads, and are not designed for heavy loads.
- 26. Do not leave the aerial platform unattended with the key in the switch. This will prevent unauthorized use of the equipment.
- 27. The engine shall be shut down while fuel tanks are filled. Fueling and battery charging shall be done in well-ventilated areas free of flame, sparks, or other hazards which could cause a fire or explosion.
- 28. The boom and platform of the aerial platform shall not be used to jack the wheels off the ground unless the manufacturer designs the machine for that purpose.
- 29. The aerial platform shall not be driven on grades, side slopes or ramps exceeding those for which the manufacturer rates the aerial platform.
- 30. If the platform or elevating assembly become caught, snagged or otherwise prevented from normal motion by adjacent structures or other obstacles such that control reversal does not free the platform, all personnel shall be removed from the platform before any attempts are made to free the platform using ground controls.
- 31. Before and during driving the aerial platform while in an elevated position, the operator shall:
 - a. Maintain a clear view of the path of travel.
 - b. Maintain a safe distance from obstacles, debris, drop-offs, holes, depressions, ramps, and other hazards to ensure safe elevated travel.
 - c. Maintain a safe distance from any overhead obstructions or hazards.

Motor Vehicles

Inspections shall be performed at the beginning of each shift, and those found not in safe working condition, shall be tagged and taken out of service and replaced until properly repaired. This program applies to all vehicles and mobile equipment, which are available for use or used by employees. All operators shall have responsibility for complying with federal regulations when operating all equipment.

- 1. All machinery and equipment shall be inspected prior to use, and during to ensure good operating condition. All defective equipment will be properly tagged out of service, and removed from the work area.
- 2. All vehicles must be maintained in operable condition at all times in accordance with DOT Regulations. (Department of Transportation)
- Anyone who operates a commercially licensed vehicle owned or controlled by Kennedy Glass LLC must possess a valid State Drivers' License.
- 4. Start equipment and make sure all controls are operating properly. Report all deficiencies to your supervisor immediately before operating.
- 5. Each employee who operates, or has supervision over the operation of any Contractor vehicle has the responsibility for:
 - a. The Vehicle
 - b. Safety Cargo and/or passengers
 - C. Defensive Driving
 - d. Physical Hazards
 - e. Securing Vehicles and/or equipment
 - f. Cleanliness for that equipment
 - g. Reporting of all accidents
- 6. An accessible ABC Fire Extinguisher shall be available for all equipment and machinery, if required by the manufacturer.
- 7. All operators shall walk completely around the equipment to be sure that no obstacles are in the area before placing equipment in motion.

- 8. Start and operate equipment only from the operator's station or from a safe area as recommended by the equipment manufacturer.
- 9. There will be no passengers allowed, except for the transport of Contractor employees. All passengers must be provided a secured seat and a safety belt as needed.
- 10. Permit no riders on running boards, fenders, tailgates, bumpers, beds, dump trailers, or in any other hazardous location.
- 11. Clear all mud, rock or other debris from equipment or machinery that may fall off during transit.
- 12. On over-dimension loads, use proper signs, lights, and flags.
- 13. Operators shall not use motor vehicles having an obstructed rear view unless the vehicle has an audile reverse alarm or has an observer watching the path of the vehicle to avoid accidents and injuries to workers or property.
- 14. When mounting or dismounting vehicles and/or equipment, face the equipment using hand holds, steps or ladders to prevent slips and falls. Ensure that all mud and rock or other debris is cleaned off the bottom of work boots before entering the equipment.
- 15. All equipment must have an approved seat belt per the manufacturer's recommendations. All operators will be required to wear a seat belt when operating earth-moving equipment with a (ROPS) Roll-Over Protective Structure cab in an area where there is a possibility of overturning.
- 16. Keep steps ladders and cabs clean and free of oil, grease, fuel, and mud.
- 17. Check the clearance in your work area, including all overhead power lines before starting your operation.
- 18. When vehicles or motor equipment are stopped and parked, the parking brakes will be set. Equipment on inclines shall have the wheels chocked or blocked as well as the wheels turned.

- 19. When leaving equipment unattended, make sure the buckets, booms, blades, beds, forks, are all lowered to a down position, or blocked, and apply brake locks.
- 20. Never approach a machine from the blind side. Be sure the operator is aware of your presence before approaching.
- 21. When other co-workers are in or near the work area, signal your intentions before moving or operating your equipment. Use barricades to prevent unauthorized entry if needed.
- 22. Observe a safe speed on all haul roads and adjust speed for winter or adverse conditions. Give the right of way to loaded vehicles. Report any unsafe road conditions to your supervisor.
- 23. Never smoke in fueling areas or throw cigarette butts from vehicles or equipment, especially when carrying combustible or flammable products. If refilling gas cans, remove the cans from the truck bed before filling to prevent static electricity build-up and fire.
- 24. Do not change blades, cutting edges, or attachments unless equipment is properly blocked to prevent falling or shifting before employees are permitted to work under or between them.
- 25. As an operator, you will be exposed to environmental hazards, which cannot be controlled at the source. Under these circumstances, you will be required to wear suitable hearing protection when operating all equipment when sound levels exceed the permissible exposure limit set by OSHA Regulations.
- 26. At the end of each shift, secure and lock equipment so that unauthorized persons cannot move it. Lock all vandalism covers and remove keys.
- 27. All equipment left unattended at night adjacent to the highways or construction areas shall have lights, reflectors, warning signs, and/or barricades to identify the location of the equipment.

Fall Protection

The purpose of this procedure is to ensure that employees are protected from fall hazards in accordance with Federal safety regulations. Supervisors are required to monitor and enforce the use of this procedure. Workers will be responsible to know and follow this safe operating procedure for fall protection.

The goal of this procedure is to eliminate or control every fall exposure at our worksites. In the event of the need for fall protection, we will engineer and utilize fall protection systems to protect employees. This may include safety nets, standard guardrail (handrail, mid rail, toe board), personal fall arrest systems, warning lines and safety monitoring systems. If standard fall protection is not feasible, all workers must tie off. Tie-off must be done with a full body harness and shock-absorbing lanyard equipped with double locking snaps. Only locking type snap hooks will be permitted for use in personal fall arrest systems and positioning systems.

The lanyard must be attached to the D-ring in the center of the back and the other end to a structural member capable of supporting a 5,000-pound load in the event off a fall. The tie-off point shall be above the head as high as practical to prevent injury. The lanyard can be no longer than six feet. Employees working from swing scaffolds, boatswain chairs, spider baskets, etc., shall tie off to an independent lifeline that is securely attached to a structural member. Each worker will have a separate lifeline to themself.

Employees working near electrical equipment shall use nylon or other nonconductive lanyards. Steel slings will not be used.

All fall protection equipment will be damage free and kept in good repair. Any equipment subject to in-service loading (I.E. a fall) will be immediately removed from service and inspected before any additional use.

All employees exposed to fall hazards will be trained in this procedure. Documentation of training and certification of employees will be kept by the Operations Manager. This procedure will be strictly enforced and any employee not in compliance will be subject to disciplinary action up to and including termination.

Fall protection must be utilized anytime a worker is working above six feet.

FLOOR/ WALL Openings

Openings in floors and walls are hazards. The following definitions and procedures

outline our standards for safe work around these hazards.

- A. Definitions
 - 1. Floor Hole: Any opening less than 12 inches but more than one inch in its smallest dimensions in floor, roof, or platform that materials, but not personnel, could fall through (i.e., mechanical sleeves or chases).
 - 2. Floor Opening: Any opening greater than 12 inches in its smallest dimension that personnel or materials could fall through.
 - 3. Wall Opening: Any opening at least 30 inches high and 18 inches wide, in any wall or partition, that personnel or material could fall through (i.e.., duct work openings, windows, or louvers).

B. Floor Holes

ALL Floor Holes 2 INCHES OR LARGER IN DIAMETER should be covered with Plywood or materials of similar strength. It shall be capable of supporting 2 times the intended load of workers, materials, or equipment without failure. The cover should be secured, so materials cannot fall through the opening to working areas below. See signs and labeling below for further requirements.



C. Floor Openings

Every permanent or temporary floor opening must be covered or protected by a standard guardrail with a midrail and toe board. The guardrail should protect all sides of the opening except at the entrances to stairways. Covers must be of sufficient strength to support any anticipated loads.



Hatchways and chutes must be guarded by a hinged cover and guardrails mounted, so only one side remains exposed for entry and exit.

D. Wall Openings

When the bottom edge of a wall opening is less than 39 inches above the walking surface, it must be protected with a standard guardrail. A toe board must be used when the bottom edge of the opening is less than four inches above the walking surface.

It is also acceptable to completely cover the opening, instead of using a guardrail. If a cover is used, the covering material must be able to withstand a force against it of at least 200 pounds without failure.



E. Signs and Labeling

Where covers are used, they must be labeled "Caution - Floor Opening - Do Not Remove" or "Caution - Wall Opening - Do Not Remove" with at least two inch lettering. Stencils are available through Safety Suppliers.

Guardrails

Guardrails are placed to prevent accidental access to physical hazards such as moving machinery, falls, or electrocution. At minimum, guardrails will meet the following standards.

A. A standard guardrail system must consist of:

- i A top rail
- ii A midrail
- iii Several upright supports or posts
- iv A toe board
- B. The top rail shall be a 2" x 4" board mounted at a height of 39-45 Inches (from the floor or platform to the upper surface of the top rail, and shall be capable of withstanding a 200 pound force when pushing down or outward on the top of the board without failure.)
- C. The <u>midrail</u> shall be a 2" x 4" board mounted mid way between the floor or platform and the underside of the top rail (18-24 inches) and shall be capable of withstanding a 150 pound force when pushing down or outward on the top of the board without failure.
- D. The **posts or uprights** shall be a 2" x 4" board long enough to support the top rail at its proper height. They shall not be spaced more than 8 feet apart.
- E. The <u>toe board</u> shall be a 1" x 6" board mounted horizontally at the level of the floor or platform and shall be capable of withstanding a 50 pound force when







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pushing down or outward on the top of the board without failure.

- F. A <u>steel cable</u> can be used for both the top and mid rail as long as it is at least 1/2 inch cable and the cable is kept at a height of 39 45 inches from the walking or working surface.
- G. <u>Iron pipe</u> can be used for the upright supports or posts as long as it is at least 1-1/2 inch outside diameter and brackets are used on the pipe to support the rails at the proper heights.
- H. Where material is piled above a standard toe board, **paneling or screening** from floor to midrail or to top rail must be used.
- I. Guardrail components removed or taken down must be **replaced immediately** by the same party.
- J. No materials or objects should snag clothing or employees as they access and work near the rails.

Floor Perimeters

Open Floor Perimeters - General Building

- Whenever there is the potential for a fall of 6 feet or more, the perimeter must be protected by a minimum of a standard guardrail. (See above guardrail specifications.)
- 2. Any employees who will work outside the perimeter must be tied off with approved fall protection to an anchorage capable of supporting 5000 pounds per person. Standard lumber and some perimeter wire rope cable guardrails must never be used for tie-offs.

Open Floor Perimeters - Multi-story High Rise

- Wherever there is the potential for a fall of 6 feet or more, or where employees have an extensive need to work beyond the perimeter guard systems, cabling systems that can be used for tie-off must be installed. The following specifications are minimum standards and apply to all installations.
 - 1. All cables must be at least 1/2 inch diameter.

- 2. Two cables must be used. One to serve as a top rail mounted 42 inches above the walking surface and one serving as midrail.
- 3. Toe boards must be installed if required. Areas below work areas also may be barricaded to prevent unauthorized entry.
- 4. Splices in the cables can only be made by looping both ends and joining the loops. A minimum of three cable clamps per loop are required. See the wire rope clamp package or product installation requirements for proper installation.
- 5. Three 1/2 inch cable clamps, properly tightened, are required on all cable ends. These clamps shall be attached as follows:

Recommended Sequence of Attaching Wire Rope Clips

- a. Apply first clip one base width from dead end of wire rope. Tighten nuts.
- b. Apply second clip nearest thimble. Do not tighten nuts.
- c. Apply all other clips, leaving equal space between each clip. For maximum holding power, install clips 6-7 rope diameters apart. Take up rope slack.

TIGHTEN ALL NUTS EVENLY ON ALL CLIPS to recommended torque.

d. Inspect clips periodically. When loads are placed on rope, it will stretch and shrink in diameter. To be safe, tighten all nuts periodically.

*Wire rope sizes less than 1/2 inch requires three clips.

Tighten clips periodically to take in decrease in diameter of the rope due to tension.

- 6. Cables must be tensioned to allow minimal deflection (approximately 2 inches per 30 foot span).
- 7. Anchorage of Cable Systems: The most critical element in any cable restraint system is the anchoring. ANSI Standard A10.14-1975 clearly requires any tieoff point for fall protection to support a load of 5400 pounds per person tied off to it. In high rise construction there is frequent need to work beyond the perimeter guards and the cable

barricade is often used as the tie off point for lanyards. One-half inch cable should be strong enough to withstand any expected loading, but a cable system is only as strong as its weakest link. The weak link is almost always the anchorage.

- a. Cable anchoring means to fasten the cable end rigidly to a strong support.
- b. Cable support means to suspend or hold the cable to the correct height next to a column. This is not an anchor point.
- c. Cables must be mounted on the inside faces of the columns.
- d. The approved method for anchoring a cable to any type of column is by wrapping the cable around the column and clamping the cable back to itself.
- e. Cable must be strung, so it is anchored in straight lines. Do not string cables continuously around corners of any angle unless the corner is an anchor point.
- f. Cables can be supported on a column by using forged eye bolts or anchors, lumber drilled and secured to the column, or by welded washers and nuts. WARNING: Cables can be "supported" by these methods but not "anchored." They are not strong enough.
- g. Rebar must not be used as posts, rails, or any other component of a fall protection system.
- h. Only clean cable in good condition should be used.
- i. Cables are for personal safety only. Air hoses, cords, tarps, welding leads, etc., must never be supported by these perimeter cables.
- j. Welded washers or nuts and concrete eye bolt anchors are not strong enough to serve as cable anchors when employees are required to tie off to such cables.

ROOF

The dangers involved in working on roofs, balconies, terraces, or parapet areas can be reduced with proper protective measures and training. Employees should be told of the hazards of the falls from elevations and trained in these safety procedures before the start of work.

- A. Definitions
 - 1. Motion-stopping Safety System: Fall protection equipment systems such as guardrails, cables, scaffolds, or platforms with guardrails, safety nets, or restraint systems.
 - 2. Warning Lines: Rope, wire, or chain and vertical supports erected on flat roofs as follows:
 - a. The line must be strung tightly 36 inches above roof surface.
 - b. The line's tensile strength must be greater than 500 pounds.
 - c. The line must be flagged with high visibility flagging at 6 foot intervals.
 - d. The vertical supports must be substantial and not tipped easily, and support 16 pounds of force when applied 30 inches up on the post from the walking or working surface without failure.
 - e. The line must not be closer than 6 feet to the edge at any point for roofers or roofing work or steel erection activities. For **all** other work or trades, the line must be kept at least 15 feet from the roof edge.

B. Guidelines

- 1. Employees working on roofs must be protected from the hazards of falling at all times.
- 2. Roof areas with pre-existing perimeter walls or parapets over 39 inches do not require additional safeguarding, although special conditions may make these measures desirable. Warning lines may be used at points of the roof where the parapet wall does not have at least 39 inches of height, either 6 feet or 15 feet from the edge depending on the scope of work.
- 3. These procedures do not apply at points of access or when employees are on the roof only to inspect, investigate, or estimate roof level conditions.

C. Safety Procedures

Considering the guidelines given, all employees working on roof areas must be protected by a motion stopping safety system (see definition) when work activities take place near the edge of a roof or the roof is pitched. One of the following methods can be used:

- 1. Standard guardrails or 1/2 inch cables can be mounted at the edge of flat roofs if they will support at least 200 pounds without failure.
- 2. Scaffolds or platforms with guardrails can be erected tight against the wall and flush with the edge of flat or pitched roofs.
- 3. Safety nets can be suspended or hung to fill exposure areas where guardrails, cables, or other methods are not practical. Nets shall be kept as close to the floor as possible, and extend at least 6 feet out from the edge.
- 4. Safety harnesses with lanyards can be used if tied, so the employee can move to the roof edge but not beyond it by using a rope and rope grab, safety rope, or locking retractable.
- 5. Lifelines or lanyards can be attached to 1/2 inch cable and/or lines that are properly anchored and parallel to the roof edge if one of the following methods is used to keep the employee from going beyond the edge.
 - a. Each employee on the roof can be tied to a 3/4" poly lifeline rope that is secured to the anchor cable with a solid metal ring that can slide along the anchor cable allowing the employee to move sideways. A rope-grab can be used to attach the safety harness to the 3/4" poly rope if the distance between the anchor cable and the employee needs to be adjusted periodically.
 - b. A retractable lifeline can be used as a substitute for the ropegrab system in some instances where the line is not needed for positioning.
- 6. Motorized buggies, carts, etc., may be used and stored only in areas where employees are protected by either a Warning Line or Motion-stopping Safety System. Warning Lines and Safety Monitor System must be approved by the Jobsite Superintendent and must follow OSHA requirements.



- 7. Access areas where material is hoisted or raised on a conveyor must be guarded. Roof landing areas shall have a Warning Line System with an area used for receiving and flying materials. Guardrails or parapet walls, if used, must extend at least 39 inches on each side of the access point to protect those transferring the materials onto the roof.
- 8. Materials may not be stored near roof edges and should be secured or weighted down at all times, and shall not be thrown from the roof for any reason.

Scaffolding Use and Training

Kennedy Glass typically does not perform work that requires supported or suspended scaffolding. The only authorized scaffolding that we use is pre-manufactured scaffolding purchased and used without modification.

Scaffolding shall be set up and used only by personnel who have received instruction on scaffolding safety and scaffolding erection. Only competent personnel are permitted to set up and work on scaffolding.

Each scaffold/scaffold component shall be capable of supporting, without failure its own weight plus at least four times the maximum intended load applied or transmitted to it. Before the scaffold is used the scaffold, including all direct connections, shall be evaluated by the Safety Director, who shall confirm that the supporting surfaces are capable of supporting the loads to be imposed.

All walking surfaces shall be fully planked with walk boards which are free from knots, cracks, or defects. Scaffolding shall also include ladders to access work and toe boards to prevent objects such as tools or materials from falling. Scaffolding shall not be set up near any electrical wires with which it could come into contact.

Each employee on a scaffold more than ten feet above a lower level must be protected from falling to the lower level. Acceptable fall protection for specific types of scaffolds and work situations in found in IOSHA 29 CFR 1926.451(g).

Employees must be protected from falling objects, such as hand tools, debris and other small objects. Employees must wear hard hats when working on or from a scaffold.

Inspections shall occur each day to ensure that scaffolding is in proper working order and conditions have not changed from the prior day, which could compromise safety or operation. Should any condition be found during this inspection, the scaffolding shall be tagged out to prevent its use until corrective action can be taken.

Scaffolding is not permitted to be modified from its original design in any way or used for anything other than it was originally intended.

TYPES OF SCAFFOLDING

BAKER SCAFFOLDING, FORM SCAFFOLD, SWING STAGE SCAFFOLD, WELDED FRAME SCAFFOLDING

BAKER SCAFFOLDING

- 1. A narrow free-standing scaffold is generally referred to as a Baker Scaffold, which measure 45 inches or less across the smallest horizontal dimension.
- 2. When an employee is positioned **four feet** or more above the ground or floor directly below, standard guardrails and tow boards are **required** on all open sides and ends of the work platform.
- 3. If the scaffold has wheels, they must be locked and blocked from movement whenever employees are on the scaffold, and never move the scaffolding with employees occupying the unit. Have the workers removed, move the unit, and relock the wheels before continuing work.

The scaffold must be set plumb on solid footing Guardrail/Midrail required at 4ft and Wheels Locked when in use!

FORM SCAFFOLD

Forms used for site specific placements on concrete may require employees to move around on wall and column forms. During the cycle of positioning on a form, stripping a form, and moving forms, employees move about repeatedly. When the forms are being designed or built, features should be included that provide for safe movement of employees working with the forms.

Standard Features

- 1. Provide fully planked work platforms, free from defects and that will support 4 times the intended load.
- 2. Secure planks to platforms.
- 3. Guard all open sides with toprails, midrails, and toeboards.
- 4. Guard all open platform ends.
- 5. Provide ladders to platform areas to avoid workers climbing the form structure, which extend 3 feet above the working surface and secured in place to prevent displacement.

- 6. Create tie-off anchors if none exist.
- 7. Employees on wall forms will not step up on the wall without being tied-off, if wall forms are not at least 39 inches in height above work surface or a guardrail system is not installed.

Gang forms that utilize more than one work platform require additional features:

- 1. Mount access ladders so employees can climb from one platform level to another.
- 2. Provide hinged hatch type doors in platforms or removable guardrails to cover holes, yet allow access to and from ladders below.
- 3. If constructability allows, secure ladders to the form, so employees must face away from the form while climbing the ladders. This way, if an employee slipped while on a ladder, he would fall back toward the form, rather than away from it.
- 4. The lowest trailing platform must be assembled so that the platform is completely covering all openings right up to the wall. <u>No open holes shall exist</u> <u>between the wall and the platform.</u>

General Practices

- 1. Keep platform areas clean at all times.
- 2. Lifting attachment points must be properly spaced and devices securely attached.
- 3. Taglines must be used to control the movement of crane handled forms.
- 4. Personnel are not allowed to ride a form or be directly under a form while it is being moved or suspended in the air.
- 5. Know the weight of a form, the capacity of the hoisting equipment and methods to safely move forms on the project, and the **proper hand signals for crane direction**. These signals are located in the **appendix section** of this manual.

SWING STAGE SCAFFOLD

Before any suspended swing-type scaffold is set up on our projects, the Glazing Superintendent will review the following guidelines with the intended user of the scaffold. Work using the scaffold will not be started until these guidelines are met.

A. Single Platform Scaffolds

- 1. Only commercially manufactured platforms are acceptable. (Example: aluminum pick platform)
- 2. The platform shall not be less than 20 inches, nor more than 36 inches wide overall.
- 3. The platform shall be securely fastened to the steel hangers of the hoisting frame.
- 4. The platform shall be provided with a standard guardrail, an intermediate rail, and a tow board along the entire length of the platform on the outer side. Both ends must also be guarded. Mesh can also be used when practical. The inner edge will also be guarded in this manner if a fall exposure exists at this edge during the scaffold's travel.
- 5. The maximum allowable load on the scaffold must never exceed the rating of the weakest component of the system. No more than two employees shall be permitted to work at once on scaffold rated for work loads of 500 pounds. No more than three employees shall be permitted on scaffolds rated for work loads of 750 pounds.
- 6. The scaffold must be suspended by the cable or rope that can support at least six times the maximum allowable load. Other hardware and structure must support four times the maximum allowable load.
- 7. All installations shall be <u>anchored twice</u> with primary and secondary anchors.
- 8. Primary anchors will consist of devices such as cornice hooks and parapet clamps. Others include counter weighted devices such as outrigger beams, rolling outrigger towers, or rolling roof rigs.

- 9. Secondary anchors can be 3/8 inch cable or 3/4 inch manila rope used to secure the primary anchor to a structurally sound component of the building.
- 10. Primary anchor shall meet the following criteria:
 - a. Be only of structural metal
 - b. Be equipped with an eye bolt, a shackle, or other safe means of attaching supporting ropes and/or cables.
- 11. Each cable connection will have three appropriate sized fist-grip-type cable clamps.
- 12. When primary anchors are secured with counterweights, these weights shall be securely fastened to the outrigger system as designed, or tied onto the beam. <u>Counterweights must consist of a solid non-flowable material.</u> Flowable material such as bags filled with sand are illegal.
- 13. The overhang of outrigger beams must not exceed the distance specified by the manufacturer. Use correct number of counterweights as specified or if other methods of rigging are used, assure that they are capable of safely supporting the maximum total load with a minimum safety factor of 4 - 1.
- 14. The formula for calculating the correct amount of counterweight is as follows:

 $CW = \frac{4 \times 1000 \times C}{L}$ (Example for 1,000# system) L CW = Required amount of counterweight (#) C = Cantilever distance L = Distance in feet from point of support to center of counterweight 4. = Safety factor (4 - 1)

Refer to Diagram at end of this Section

- 15. A ³/₄ inch lifeline rope shall be securely attached twice to substantial members of the structure at its upper elevation or always hang past the scaffold.
- 16. The lifeline will not be anchored to any part of the scaffold system.

- 17. Each employee on a stage shall be secured to their own independent lifeline which will safely suspend the employee in case of a system failure.
 - i Each employee shall wear a full body safety harness.
 - ii Use a lanyard that features a shock absorbing device.

iii Secure the lanyard to a rope by means of an approved rope grab device.

- 18. The scaffold should always be tied into the building or structure from which it hangs, except while being raised or lowered.
- 19. Inspect all components of the scaffold system before using and recheck regularly to assure they are maintained in a safe and proper condition.
- 20. When setting up or relocating the primary anchor devices, employees must use a fall protection method that offers protection while they are near an edge. TABLE NUMBER OF 55# COUNTERWEIGHTS REQUIRED

с	L	CW TOTAL	QTY OF 55# WEIGHTS
2	12'	667#	13
2	11'	727#	14
2	10'	800#	15
2	9'	888#	17
1	12'	333#	7
1	11'	364#	7
1	10'	400#	8
1	9'	445#	9

TABLE COURTESY OF WACO INTERNATIONAL CORPORATION

WELDED FRAME SCAFFOLDING

The erection, use and dismantling of scaffolds must be thoroughly planned, so they will function as intended. To build a scaffold that is safe for employees to work on, you must provide all the materials needed to correctly assemble the scaffold. Then erect it straight, level, and plumb on firm footing. A competent person must be on-site at all times to supervise the scaffolding work and must have thorough knowledge of the following items.



A. Foundation

1. The foundation must be capable of supporting 4 times the desired load including building materials.

- 2. Mud sills are required on soil or soft footings.
- 3. Base plates must be placed under all legs on any scaffold.
- 4. When a scaffold is erected on uneven ground, adjusting screws must be used in all legs.
- 5. A scaffold being set up on uneven ground must not be leveled using building materials such as brick, or loose fill, such as soil.

B. Frames

- 1. Frames must be vertically aligned on the coupling or stacking pins.
- 2. Frame sections must be pinned together to prevent them from separating, or be secured together in some other manner approved by the manufacturer of the scaffold. *Wire or nails are not to be used for this securement.*
- 3. When outrigger platforms are required position the base frames so that the platform will be within three inches of the wall when erected.
- 4. If the height of the scaffold is to be more than 125 feet, and engineers approval of the scaffolding must be completed. Call the Project Manager if this approval will be required.

C. Bracing

- 1. All vertical frame members must be connected horizontally at regular intervals with cross braces.
- 2. Where a brace has been left out to allow for feeding materials onto the scaffold a removable guardrail must be provided and kept in place during all other activities.
- 3. Cross braces are not considered to be guardrails at any time, a standard top and mid rail with toe boards will be utilized at all times.
- 4. Cross braces are not to be used as a way to climb or access any scaffold.

D. Securement

- 1. Secure the scaffold throughout its entire length and height. This can be done by tying it solidly to the building structure or by providing an alternative means of keeping the scaffold upright, such as guying it down or bracing it to existing supports.
- 2. At a minimum, secure the scaffold every 30 feet horizontally and 26 feet vertically.

E. Planking

- 1. Fully plank all scaffolding work platforms to the full width of the platform which employees will work on, post to uprights.
- 2. If the platform cannot be fully planked, then erect the guardrails around the area that is planked.
- 3. Planking must be 2" x 10" or wider scaffold grade wood plank or manufactured metal plank. Look for OSHA symbols or plank markers.
- 4. All wood planks must have cleats attached under the ends of the plank to prevent it from sliding, and should extend a minimum of six inches over the end supports, and a maximum of 12 inches for an 8 foot plank, and 18 inches for planks greater than 10 feet in length.
- 5. Continuous horizontal runs of planking must overlap at least 12 inches and be secured in place.

F. Loads

- All loads are considered to be heavy. Heavy Duty scaffolds require components that are rated to support at least 75 pounds per square foot of work platform. All scaffolding must be certified to support 4 times the intended load to be placed upon it.
- 2. Material loads shall be evenly distributed on platforms and not concentrated in one small area. Pallet loads of heavy materials such as block, brick, etc., may need to be broken down to prevent overloading the platform. Never allow the planks to deflect more than 1/60th of the total span of the plank, and watch for signs of cracking or overloading. No cracks larger than 6 inches will be permitted.

G. Guardrails and Toe Boards

- 1. Top rail, midrail, and toe boards are required on all frame scaffold platforms where employees will work. These components must be installed on platforms located **6 feet and higher**.
- 2. Support posts for guardrails must be positioned at no more than 8 foot intervals, or as constructability allows.
- 3. Locate top rails 39-45 inches above the work platform.
- 4. Scaffold cross braces are not considered to serve as guardrails at any time.
- 5. Platforms require guardrails positioned across the ends of the platforms, unless used for access, and then a temporary guardrail may be utilized.
- 6. Safety harness tie off systems will be used by employees when work activities expose them to unguarded areas on scaffolds, or while guardrails are removed for loading or unloading.

ACCESS

Tubular welded frame scaffolds must be designed to include a safe means of access for employees to get to and from work platforms.

Climbing scaffold frames without an access ladder/stairway is prohibited, unless the end frames are designed to be used for scaffold access. Side frame rungs must be longer than 11 ½ inches, with no more than 16 inches between each rungs. All rungs must be evenly spaced the entire distance up to the working levels, or another ladder must be provided.

These are acceptable methods for providing access to the scaffold from the ground:

1. Ladders can be used on single frame scaffolds two tiers high or less (10 to 12 feet). Extend the ladder 36 inches above landing and secure.

2. One ladder system must be installed for every 100 horizontal feet of multisection scaffold.

Access Ladders/Stairways

- 3. Scaffold frames with built-in ladders or scaffold systems with ladders designed to be added on can be used up to three tiers high (15 to 18 feet).
- 4. <u>Internal scaffold stairway systems</u> are mandatory on any scaffold higher than three tiers (15 to 18 feet). They are recommended for any scaffold, if constructability allows. One stairway system must be installed for every 150 horizontal feet of multisection scaffold.

Properly constructed and guarded access ramps or walkways must be provided wherever the scaffold is to be accessed from adjacent structures at various levels and a fall hazard exists. Walkways must be at least 18 inches wide, and have fall protection if the fall distance is greater than 6 feet to a lower level.

Inspections of scaffolding

Regardless of the scaffold systems in use, a pre-work "Daily Inspection" must be performed by a "Competent Person" using the "Daily Scaffold Inspection" form found in the appendix section.

To demonstrate compliance with this requirement a "Tagging System" will be implemented.

- **A.** <u>**Red Tag:**</u> The scaffold is not safe for use (ie., under construction, failed inspection, accident has occurred).
- **B.** <u>Yellow Tag:</u> The scaffold is being constructed or dismantled, only the trained workers are permitted to access.
- **C.** <u>Green Tag:</u> The scaffold is safe for use by all employees trained in proper scaffold use (Scaffold User).
- **D.** <u>**Tags:**</u> The following is a sample of the required tags to be used;

"A WINDOW TO SAFETY"







Kennedy Glass Safety Manual, revised 2021

Ladder Training Program

Ladders and stairways present unique hazards in the workplace and are responsible for many of the injuries that happen on the job. It is necessary for all Kennedy Glass employees to be trained in the proper use of ladders and stairways and to recognize the hazards associated with their use. This written program establishes the training requirements for ladders and stairways.

This training is mandatory for each new employee and will be conducted at the time of hire as part of the initial orientation and annually for existing employees as refresher training. The Glazing Superintendent is responsible for conducting this training to nonsupervisory personnel in accordance with the program. The training will be conducted in conjunction with the toolbox talks and documented on the tool box talk form. This will be filed.

At a minimum, the Glazing Superintendent will cover the following items during the training classes.

- 1. General
 - a. Ladders shall be provided as access points where there is a break in elevation of 19 inches.
 - b. Keep at least one point of access clear at all times.
- 2. Ladders
 - a. Portable ladders shall be tied, blocked or otherwise secured to prevent movement.
 - b. Portable metal ladders shall not be used for or near electrical work.
 - c. Inspect ladders frequently at regular intervals. If any ladder is found defective, red-tag it until it is repaired or discarded. Never use a defective ladder.
 - d. Do not paint the sides of ladders. It could hide defects.
 - e. Clean mud and greasy substances from the feet before using a ladder.
 - f. Place the ladder at a 4 to 1 ratio vertical to horizontal.

- g. Always face the ladder and hold on with both hands using three points of contact at all times.
- h. Use a safety belt if the type of work requires it.
- i. It is dangerous to reach out too far from the ladder in any direction, move the ladder as the work requires it.
- j. Never use a ladder as a horizontal member of a scaffold.
- k. Set the base of the ladder back one foot for every four feet of ladder length. For example, a 12 foot ladder should be set back three feet at the base.
- I. As a general rule Do not stand or use the top two steps of a step ladder.
- m. Portable straight ladders used on smooth surfaces must be equipped with non-slipping feet or be otherwise prevented from slipping.
- n. Do not position ladders in platform boxes that are mounted on mobile equipment to reach work areas, or scaffolding and aerial / scissor lifts.
- o. When moving an extension ladder more than 10 feet, first reduce the ladder height then raise it again at the next work area. This will help prevent back strain.
- p. Step-ladders shall be used only in the opened and locked position, and shall not be used closed and leaned against a wall or structure
- q. Face the ladder when ascending or descending, and always maintain 3 points of contact while climbing or working off ladders, or Fall Arrest equipment must be utilized for any work at 6 feet or more above a lower level.

Fall Arrest

<u>Scope</u>

All work activities and exposures will be accessed to determine if fall hazards are present, or likely to be present, which will necessitate increasing the level of fall protection.

A. Full-Body Harnesses, Lanyards, Lifelines, & Chain Assemblies

A full-body harness with a lanyard attached appropriately at the middle of the back and secured to a rope grab and lifeline or an object capable of supporting 5,000 pounds shall be worn by employees where:

- a. They are not protected from a fall of more than six (6) feet by other methods, such as guardrail system, Contractor safety policy, catch platforms, nets, etc.
- b. When working off a swing stage or suspended personnel platform.
- c. Any other situations or conditions that dictate the use of fall protection.
- d. A full-body harness including the hardware must be inspected daily before each use. Inspect for broken or worn hardware, loose rivets, and torn or rotted fabric or materials. Lanyards shall be as short as possible, but never longer than six (6) feet.
- e. Lanyards shall not be lengthened by connecting two lanyards together, and shall be used according the manufacturer's recommendations at all times.
- f. A lifeline or lanyard shall be secured to an anchorage of structural member capable of supporting a dead weight of not less than 5,000 pounds per person.
- g. When securing to a structural member, tie off the lanyard and lifeline as high as possible to minimize the falling distance, but never below waist level, or a height which would allow a worker to free fall farther than 6 feet.
- h. Never attach your lanyard below you or climb higher than where your lanyard is attached; this will increase the distance and force in the event of a fall. The maximum free fall distance shall be 6 feet. A double lanyard or retractable lifeline may be utilized.
- i. The use of homemade or job-made hooks or attachment devices is strictly prohibited.
- j. All safety latches shall be of the double locking type and in working condition. Always try to hook "metal to metal" at all times to prevent damage to slings or nylon materials.
Whenever the use of general fall protection systems is infeasible or creates a greater hazard, the Supervisor shall be contacted and a site-specific fall protection plan will be developed and implemented before work begins. All employees shall be trained and sign an attendance sheet for jobsite records.

Fall Restraint Systems may be used which will keep all employees from falling. These systems use enough lifeline to reach the nearest edge, but do not have the length to reach the edge to fall. (This includes arm and legs)

All Contractor employees and all subcontractor employees will be tied off when exposed to fall hazards of over SIX FEET (or where restraints from hazards such as energized or moving machinery are required.)

B. Safety Harnesses: The standard fall protection issued will be the safety harness and lanyard system. They will be full-body, friction buckle, and universal fit type. Lanyard will be an adjustable shock absorbing type designed to minimize shock to the body should a fall occur. Hooks will be double locking to prevent "roll-out" from occurring. Harnesses should be worn snug and lanyards should be adjusted to the shortest practical length to minimize fall with the anchorage point at the waist level or higher if possible. All Fall Protection Equipment shall be visually inspected for defects before each use. If found defective, have the equipment immediately tagged out of service or destroyed and replaced.

Harnesses are mandatory for:

1. Manhole or confined space entry - harnesses will be used with a "Y" type lanyard to facilitate emergency retrieval of employee from confinement.

2. Any person needing fall protection for fall restraint, arrest or positioning.

Guarding Assurance/Electrical Safety

Use of tools and equipment with electrically energized power is an integral part of our daily work.

As such, all tools and equipment shall be maintained in an as-new condition as possible and shall never be altered from the condition in which they are received from the manufacturer. Should any tool be found to be substandard, including but not limited to frayed or damaged wires, cracks, or missing or malfunctioning guards or switches, it shall be tagged with a Lock Out/Tag Out tag as detailed in the Lock Out/Tag Out section of this safety policy.

Source power shall be evaluated to ensure that the amperage capacity is appropriate for the equipment being used and that the proper circuit breakers are in place to arrest power in case of any power surge or ground fault.

Ground Fault Interrupters <u>shall be used at all times</u> when operating electrically energized equipment and shall be tested prior to work daily to ensure that they are working properly. Workers shall ensure that tools and equipment are protected from rain, snow and standing water, and that they are not used in conditions which may present a hazard.

Personal protective equipment, including proper hand protection and face or eye protection shall be used at all times when working with electrical equipment.

To protect employees working with electrical parts and machines, the following safety plan has been implemented:

- 1. Electrical current will flow to ground by the path of least resistance whether it is through you or a wire. Prevent yourself from becoming a path of least resistance.
- 2. All extension cords and temporary wiring must be a three-wire conductor and used with a ground fault interrupter.
- 3. Know whether wire (circuit) is energized before beginning work near any electrical wiring.
- 4. Never make electrical repairs, connections, or installations unless you are qualified to do so.
- 5. All extension cords must be checked before use. Remove any damaged cords from service immediately; tag them and report them to your supervisor.
- 6. Protect extension cords and wiring from sharp corners, pinching, and being run over.
- 7. All temporary light wiring should be supported 8' off the floor and not hung on nails or non-insulated wire.
- 8. All light bulbs exposed to contact are to be guarded.

- 9. Do not wear metal or conductive hard hats when working near electrical wiring.
- 10. Know the location of electrical circuits before beginning such work as drilling, jack hammering, or excavating to prevent accidental contact.
- 11. Work on energized parts is prohibited.
- 12. GFI protection will be used on all wiring installments on job sites.

Personal Protective Equipment

Personal protection is a critical part of any safe work environment.

Personal Protective Equipment is defined as any garment and or equipment required assuring the safety of workers during the normal course of work.

The following represent minimum personal protective equipment for general construction installation:

- 1. Leather Upper work shoes or boots
- 2. Safety Glasses
- 3. Hearing Protection
- 4. Hard Hats
- 5. Safety Gloves

During the course of business, hazards shall be established for each job being performed. The Job Leader or Supervisor shall review these hazards. All necessary Personal Protective Equipment will be issued with instruction for use. The issuance of this equipment shall represent the minimum equipment required to assure the safety of personnel on the job.

HARD HAT PROTECTION

OSHA 1926.750

<u>All</u> employees, subcontractors, suppliers, and visitors are required to wear hard hats meeting ANSI standards 100% of the time while on site, free from defects or holes. Hard hats will be furnished by the Superintendent and worn "Brim Forward".

HIGH VISIBILITY CLOTHING

OSHA 1926.750

<u>All</u> employees, subcontractors, suppliers, and visitors are encouraged to wear "High Visibility" clothing on the outer most part of their attire to protect against "Struck By" hazards associated with vehicle traffic, heavy equipment traffic, delivery vehicles, etc. Struck by Hazards are the second (2nd) leading cause of fatalities on construction projects!

HEARING PROTECTION

OSHA 1926.750

Hearing can be slowly destroyed by repeated exposure to loud noise. Operations that create a loud sound while in use should be taken outside or away from other employees, when possible. The Contractor requires employees in high noise jobs to wear hearing protection. Several types are available to suit various needs.

- 1. Disposable Plugs: These provide more protection than any other device, including muffs. They should be discarded at the end of each shift.
- 2. Permanent Plugs: These are less effective than disposables and require regular cleaning but are available through the Superintendent for those who are uncomfortable with disposables.
- 3. Muffs: Muffs are generally better protection than permanent plugs. They are used by those who are irritated by plugs.

All hearing protection should be kept clean and stored in sanitary conditions. Each device must be properly fitted. *A rule of thumb should be used while working: If you are 3 feet or closer and cannot clearly understand another worker's instructions without shouting or raising your voice, protection should be used.*

EYE PROTECTION

OSHA 1926.750

Safety glasses can be made mandatory on jobsite at the discretion of the Superintendent. Eye protection is always mandatory in high-risk jobs such as operating power and hand tools, overhead work, and working in areas where others are performing these tasks. The Contractor will provide the protection at no charge to any worker requesting it. All types are available through our safety equipment supply agreement.

A. Non-Prescription

- 1. Clear Safety Glasses: must be used any time eye hazards exist that do not require the added protection of a full goggle.
- 2. Gray Safety Glasses: used for glare protection as well as impact protection. To be used outdoors only.

- 3. Green Safety Glasses: special "Calobar" green lenses are used to protect from welding flash. These are not dark enough to replace goggles. These are for helpers or to be worn under a welding hood.
- 4. Impact Goggles: to be used where blowing dust or extreme hazard to the eyes exist.
- 5. Cutting Goggles: must be used when flame cutting and gas welding.
- 6. Face Shields: to be used for face and throat protection with safety glasses or goggles under for eye protection.
- 7. Welding Hoods: must be used when arc welding.

Prescription Eye Wear Program

Prescription safety eye wear is available for purchase through the Safety Supplier. The Glazing Superintendent is responsible for providing adequate supplies of safety equipment on the jobsite.

RESPIRATORY PROTECTION

OSHA 1926.750

Respirators will only be used when it is not possible to clear the air through other engineering or administrative control methods. Respirators will only be used in accordance with this program and applicable OSHA regulations.

Whenever the Superintendent believes air quality will be poor, he should consult the Safety Director for assistance in identifying the potential hazards and selecting the proper protective measures. (i.e., ventilation, employee rotation, etc.) This will be done when planning the project. After the project is under construction, the Superintendent has the responsibility for monitoring air quality.

VOLUNTARY USE RESPIRATORS (DUST MASK) (see next page)

Respiratory Protection Program

Copy given to all employees who choose to wear approved N-95 Dust Mask during work in our operation. **NOTE: Voluntary Use Only***

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

- 1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
- 2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- 3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
- 4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

[63 FR 1152, Jan. 8, 1998; 63 FR 20098, April 23, 1998]

By signing below, I understand the information provided above and agree to follow all safety precautions when I voluntarily use an approved N-95 Respirator (dust mask).

Print Name:

Date:

Signature:

Asbestos Policy

Personal protection is a critical part of any safe work environment.

Asbestos is a known health hazard in a free form. These materials were commonly used in various construction materials prior to the early 1970's. Asbestoses in a free or airborne state are known to present respiratory health hazards.

Kennedy Glass' policy is clear on "Asbestos". No worker is permitted to work in any area where the potential for airborne Asbestos exists. If this condition is known, work shall stop immediately, and the work area shall be evacuated.

Qualified personnel shall access the work hazard. Work will not commence until the hazard is eliminated or appropriate safety measures and equipment is provided to prevent potential work hazards.

Silica Policy

The purpose of an exposure control plan (ECP) is to set out our approach to protecting workers from harmful exposure to airborne silica dust. A combination of control measures will be required to achieve this. We must be diligent in our efforts to select the most effective control technologies available, and to ensure that the best practices, as described in this ECP, are followed at our worksites.

Due to the significant risk posed by respirable silica, it is critical that all personnel involved in operations that could potentially be exposed to silica dust take specific action to ensure that, as much as possible, a hazard is not created.

- A. Management is responsible for
 - 1- Knowing what materials are being cut for window placement.
 - 2- Ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this exposure control plan (ECP) are readily available where and when they are required.
 - 3- Providing a job specific ECP for each project, which outlines in detail the work methods and practices that will be followed on each site. Considerations will include.
 - 4- Availability and delivery of all required tools/equipment
 - 5- Scope and nature of any grinding/cutting work to be conducted.
 - 6- Control methods to be used and level of respiratory protection required.
 - 7- Conducting a periodic review of the effectiveness of the ECP. This would include a review of the available dust-control technologies to ensure these are selected and used when practical.
 - 8- Ensuring that all required tools, equipment, and personal protective equipment are readily available and used as required by the ECP.
 - 9- Ensuring supervisors and workers are educated and trained to an acceptable level of competency.
 - 10- Maintaining records of training, fit-test results, crew talks, and inspections (equipment, PPE, work methods/practices).
 - 11- Coordinating the work with the prime contractor and other employers to ensure a safe work environment.
- B. The supervisor is responsible for:

1- Obtaining a copy of the ECP from the employer, and making it available at the worksite.

- 2- Selecting, implementing, and documenting the appropriate site-specific control measures
- 3- Providing adequate instruction to workers on the hazards of working with silica containing materials (e.g., concrete) and on the precautions specified in the job specific plan covering hazards at the location.
- 4- Ensuring that workers are using the proper respirators and have been fit-tested, and that the results are recorded.
- 5- Directing the work in a manner that ensures the risk to workers is minimized and adequately controlled.
- 6- Communicating with the prime contractor and other sub-contractors to ensure a safe work environment.
- C. The worker is responsible for:
 - 1- Knowing the hazards of silica dust exposure
 - 2- Using the assigned protective equipment in an effective and safe manner
 - 3- Setting up the operation in accordance with the site-specific plan
 - 4- Following established work procedures as directed by the supervisor.
 - 5- Reporting any unsafe conditions or acts to the supervisor.
 - 6- Knowing how and when to report exposure incidents.

Silica Properties

Silica is the second most common mineral on earth and makes up nearly all of what we call "sand" and "rock." Silica exists in many forms—one of these, "crystalline" silica (including quartz), is the most abundant and poses the greatest concern for human health. Some common materials that contain silica include:

- 1- Rock and sand
- 2- Topsoil and fill
- 3- Concrete, cement, and mortar
- 4- Masonry, brick, and tile
- 5- Granite, sandstone, and slate
- 6- Asphalt (containing rock and stone)
- 7- Fibrous-cement board containing silica.

Silica is a primary component of many common construction materials, and silica containing dust can be generated during many construction activities, including:

Abrasive blasting (e.g., of concrete structures) Jackhammering, chipping, Cutting or drilling rock or concrete. Cutting brick or tiles Sawing or grinding concrete. Tuck point grinding Road construction Loading, hauling, and dumping gravel. Demolition of structures containing concrete. Sweeping concrete dust

Health Hazards

Exposure to silica has been shown to cause silicosis, lung cancer, pulmonary tuberculosis and other airway diseases. Crystalline silica dust can cause a disabling, sometimes fatal disease called silicosis. The fine particles are deposited in the lungs, causing thickening and scarring of the lung tissue. The scar tissue restricts the lungs' ability to extract oxygen from the air. This damage is permanent, but symptoms of the disease may not appear for many years.

- A. A worker may develop any of three types of silicosis, depending on the concentrations of silica dust and the duration of exposure:
 - Chronic silicosis—develops after 10 or more years of exposure to crystalline silica at relatively low concentrations.
 - 2- Accelerated silicosis—develops 5 to 10 years after initial exposure to crystalline silica at high concentrations.
 - 3- Acute silicosis—develops within a few weeks, or 4 to 5 years, after exposure to very high concentrations of crystalline silica.
- B. Initially, workers with silicosis may have no symptoms; however, as the disease progresses, a worker may experience:
 - 1- Shortness of breath
 - 2- Severe cough
 - 3- Weakness
- C. These symptoms can worsen over time and lead to death. Exposure to silica has also been linked to other diseases, including bronchitis, tuberculosis, and lung cancer.

Risk Identification, Assessment and Control

- A. The potential for worker exposure to silica should be identified during the hazard assessment.
 - 1- A worker's exposure to silica is kept as low as reasonably achievable.
 - 2- Employees must not be exposed to airborne concentrations of silica in excess of 0.025 mg/cubic meter over an 8-hour time period. Atmospheric testing results should be assessed before a worker is exposed.
- B. A key step in developing a silica exposure control plan is to identify the work activities that would put workers at risk of exposure.
- C. Work activities that may generate airborne silica dust For silica, the route of exposure is through the inhalation of airborne dust. The employer should have a qualified person review the planned work activities to identify those that may generate airborne silica.
- D. Identify workers at risk of exposure—For example, workers who finish concrete would be at greater risk of exposure than plumbers or electrical workers.
- E. Amount of exposure—some work activities generate more dust than others, and the amount of exposure should be estimated. Published resources are available that provide air sampling data and compare silica dust levels from various construction activities.
- F. Duration of exposure—Workers who grind concrete for a full shift would be at greater risk than workers jackhammering for an hour.

Control Options

Effective control options must be used to eliminate or reduce the risk to workers from the hazards of silica dust exposure. The following hierarchy of control measures must be followed:

- 1- Elimination/substitution (e.g., using products with less silica or using work methods that would eliminate the need for surface grinding)
- 2- Engineering controls (e.g., water, local exhaust ventilation, enclosure)
- 3- Administrative controls (e.g., coordination of tasks with subcontractors, signage)
- 4- Personal protective equipment (e.g., coveralls, respiratory protection)

Personal Protective Equipment

A. Respiratory protection

- All workers who wear respirators will do so in adherence with our respirator program. 2- Respirators must be selected based upon measured exposure levels and the assigned protection factor of respirators.
- 3- Only approved respirators will be used.
- 4- Workers who wear respirators will be clean-shaven. Filtering face piece respirators give little or no protection to workers with beards, and even a minor growth of stubble can severely reduce the effectiveness of respiratory protection.
- 5- All workers who wear respirators will be fit-tested.
- 6- Workers will be properly trained in the use of respirators, and a high standard of supervision, inspection, and maintenance will be followed.
- B. Protective clothing
 - 1- Contractor will provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from silica contamination, ensure that workers' street clothing is not contaminated by silica, and ensure that a worker does not leave a restricted area until the worker has been decontaminated.

Health Monitoring

- A. Exposures to airborne concentrations of Silica must be kept below the permissible exposure limits shown in 29 CFR 1910.1000 Table Z-3.
- B. Full shift personal samples shall be representative of the employee's regular, daily exposure to silica.

Documentation A. Records

must be kept of the following:

- 1- All workers who are exposed to respirable silica dust while on the job.
- 2- Worker education and training sessions
- 3- Respirator fit-testing.
- 4- Equipment maintenance and repair
- 5- Worksite inspections
- B. The exposure control plan must be reviewed at least annually and updated as necessary by the employer, in consultation with the workplace health and safety committee or the worker health and safety representative.

Education and Training

Training is required prior to using silica-containing materials or working in an environment known to contain airborne concentrations of Silica. Periodic refresher training is also required. We will train all silica dust in the following:

1- Hazards associated with exposure to silica dust.

- 2- The risks of exposure to silica
- 3- Signs and symptoms of silica disease
- 4- Safe work procedures to be followed (e.g., setup of enclosures, disposal of silica waste, personal decontamination)
- 5- Use of respirators and other personal protective equipment (e.g., donning and doffing of personal protective equipment, and cleaning and maintenance of respirators)
- 6- Use of control systems (e.g., LEV and wet methods)
- 7- How to seek first aid (for example, the location and use of eyewash stations)
- 8- How to report an exposure to silica dust

Bloodborne Pathogens

Personal protection is a critical part of any safe work environment.

With the advent of "AIDS", awareness of disease transference by contact with another person's blood have become clearly known and understood. Protection against such an event is critical to the health and wellbeing of all workers.

In the event of an injury, yourself or coworker protection must be taken to prevent contact with body fluids. The first alternative is to allow qualified medical personnel to perform medical treatment.

In the event of an emergency, all vehicles and work areas are provided with a safety kit. These kits include protective gloves as well as sanitizing gel. Gloves need to be used to protect against contact with another person's blood should you be assisting any person injured.

All material used for the treatment of cuts shall be placed in a zip lock bag and disposed of in the bloodborne pathogen container located at the shop.

Fire Protection

Fire prevention is critical, and as such smoking is only permitted in designated areas according to local regulations, and smoking waste is to be disposed of in designated receptacles.

All flammable and combustible liquids are to be stored in approved containers. These containers shall be clearly labeled with contents as well as a MSDS label denoting associated hazards.

Fire extinguishers are dispersed throughout the Kennedy Glass facility, consistent with fire prevention codes and recommendations. In addition, each vehicle is equipped with a fire extinguisher so that field personnel always have access to this equipment.

All fire extinguishers are inspected once per month by qualified fire equipment professionals, and action is taken to assure that this equipment is annually certified, up-to-date, and functional.

Fire extinguisher training is provided at least bi-annually as part of the toolbox talk program to assure that all personnel are familiar with and qualified to use this equipment. This training includes a discussion of the different types of fires and how extinguishing each one is to be handled.

Local, state and federal fire codes must be met at all times on the jobsite. In addition, the following topics need special attention:

What does OSHA say:

A site-specific emergency response plan will be developed and agreed upon. Special situations require additional information, and each fire department shall be contacted to ensure the proper type of training and equipment is available for rescue operations. These situations include but are not limited to the following: Fall Arrest, Confined Spaces, and Excavations.

Signs and Posting

Emergency fire numbers must be conspicuously posted. Fire extinguishers and firefighting equipment must be located and clearly marked with signs. Flammable materials areas and special fire hazards must be marked with

adequate warning and instructional signs.

Storage

Flammable materials must be stored only in approved cabinets, cans, or containers to reduce the risk of ignition. Special hazards such as site gasoline supply tanks, Liquid Propane (LP) gas tanks, oxygen/acetylene cylinders, or compressed gas cylinders must be located away from ignition sources. These storage areas should also be clearly marked and guarded and designed to comply with all applicable safety regulations.

The project supervisor shall designate storage areas for all work sites, both indoors and outdoors. All flammable and combustible liquids always require careful handling. The proper storage of flammable liquids within a work area is very important in order to protect personnel from fire and other safety and health hazards, and the storage requirements are as follows:

- 1. Storage of flammable liquids shall be in NFPA approved storage lockers or in low value structures at least 50 feet from any other structure. Do not store other combustible materials near flammable storage areas or lockers.
- 2. Bulk drums of flammable liquids must be grounded and bonded to containers during dispensing.
- 3. Portable containers of gasoline or diesel are not to exceed 5 gallons.
- 4. Safety cans used for dispensing flammable or combustible liquids shall be kept at a point of use.
- 5. Appropriate fire extinguishers are to be mounted or be available within 75 feet of outside areas containing flammable liquids, and within 10 feet of any inside storage area for such materials.
- 6. Storage rooms for flammable and combustible liquids must have explosion proof light fixtures.
- 7. No flames, hot work, or smoking is to be permitted in flammable or combustible liquid storage areas.

- 8. The maximum amount of flammable liquids that may be stored in a building are:
 - a. 20 gallons of Class IA liquids in containers
 - b. 100 gallons of Class IB, IC, II, or III liquids in containers
 - c. 500 gallons of Class IB, IC, II, or III liquids in a single portable tank
- 9. Flammable liquid transfer areas are to be separated from other operations by distance or by construction having proper fire resistance.
- 10. When not in use flammable liquids shall be kept in covered containers.
- 11. Class I liquids may be used only where there are no open flames or other sources of ignition within the possible path of vapor travel.
- 12. Maintenance and operating practices shall be in accordance with established procedures, which will tend to control leakage and prevent the accidental escape of flammable or combustible liquids. Spills shall be cleaned up promptly.
- 13. Combustible waste material and residues in a building or work area shall be kept to a minimum, stored in covered metal receptacles and disposed of daily.

Use of Cabinets

Not more than 120 gallons of Class I, II, and IIIA liquids may be stored in a storage cabinet. Of this total, not more than 60 gallons may be Class I and II liquids. Not more than three such cabinets may be located in a single fire area except in industrial areas.

Storage Inside Buildings

Where approved storage cabinets or rooms are not provided, inside storage will comply with the following conditions:

- 1. The storage of any flammable or combustible liquid shall not physically obstruct a means of egress from the building or area.
- 2. Containers of flammable or combustible liquids will remain tightly sealed except when transferred, poured or applied. Remove only that portion of liquid in the storage container required to accomplish a particular job.

- 3. If a flammable and combustible liquid storage building is used, it will be a one story building devoted principally to the handling and storing of flammable or combustible liquids. The building will have 2-hour fire-rated exterior walls having no opening within 10-feet of such storage.
- 4. LPG Storage inside buildings is strictly prohibited.

Ventilation

Every inside storage room will be provided with a continuous mechanical exhaust ventilation system. To prevent the accumulation of vapors, the location of both the makeup and exhaust air opening will be arranged to provide, as far as practical, air movement directly to the exterior of the building and if ducts are used, they will not be used for any other purpose.

Fire Extinguishers

- 1. One fire extinguisher at least 10-pound ABC rated dry chemical type must be provided for each 3000 square feet of building area and one for every floor of multi-level buildings. Travel distance to the extinguishers should not exceed 100 feet from any point.
- 2. Extinguishers must be visually inspected at least weekly and maintained in good working condition. Discharged extinguishers must be refilled or replaced immediately.
- 3. Extinguishers must be conspicuously stored, well-marked, and never blocked off by stored materials or debris.
- All employees must be trained in the proper use of extinguishers. (PASS System Pull pin, Aim extinguisher,
 Squeeze handle, and Sweep nozzle)

Κ

- **1. PULL...** Pull the pin. This will also break the tamper seal.
- AIM... Aim low, pointing the extinguisher nozzle (or its horn or hose) at the base of the fire.

Note: Do not touch the plastic discharge horn



on CO2 extinguishers, it gets very cold and may damage skin.

- **3. SQUEEZE...** Squeeze the handle to release the extinguishing agent.
- **4. SWEEP...** Sweep from side to side at the base of the fire until it appears to be out. Watch the area. If the fire re-ignites, repeat steps 2 4.

If you have the slightest doubt about your ability to fight a fire.... EVACUATE!

5. There must be one 10-pound ABC dry chemical extinguisher with each oxygen/acetylene set, each gasoline storage tank, each 5-gallon gas can, each LP tank or heater and each electric arc welder.

Portable Heaters

- 1. This type of heater must always be positioned at least 10 feet from combustibles on a clean, level surface.
- 2. Solid fuel and oil-fired heaters must not be used in buildings or on scaffolding.
- 3. Circulating heaters will have at least 12-inch clearance on all sides. Radiant heaters will have at least 36-inch clearance on all sides.
- 4. Ventilation must be maintained.
- 5. Heaters must have an automatic tip over shut-off device.
- 6. LP gas must not be stored in buildings when not in use.
- 7. Temporary heaters must be kept at least six feet from LP gas tanks, with a nearby fire extinguisher available.

Housekeeping for Fire Prevention

Good housekeeping must be used to eliminate fire hazards. Oily rags or combustibles must not be allowed to accumulate and flammable or combustible refuse must be properly stored and disposed of if used.

Power Tool Safety

All Hand and Power Tools shall be inspected prior to use. This inspection should include a review to assure power cords are in good condition and grounded, guards and safeties are installed and in proper working order.

All grinding equipment shall be fully guarded, and grinding disks and belts inspected to insure that they are not worn and are in good working order prior to use.

All saws or equipment with any rotating blades shall be fully guarded, as provided by the manufacturer, when in use.

Should a tool be found to be out of compliance, a "lock-out / tag-out" tag shall be affixed to the equipment. The equipment shall be quarantined from use until repaired and approved for use.

All defective tools shall be returned to the shop manager for repair or disposal.

Personal protective equipment, including hearing protection and face or eye protection shall be used at all times when using power tools.

No personnel shall be permitted to use power activated tools prior to receiving formal written (where applicable) and practical training. The training shall be conducted by a qualified instructor provided by the supplier of such equipment. All trained personnel shall carry a certification card validating the completion of training and indicating that he or she is authorized to use such equipment.

Powder Actuated Tools

Use of any powder actuated tools or equipment requires specific training by the distributor of the tools, as well as a license to operate. Training will be conducted either in our shop or at the point of purchase of such tools.

The following guidelines are required, and must be followed when operating these tools:

- 1. Only trained and licensed personnel may use powder actuated tools
- 2. Handle the tools with the same respect and safety precautions as you would a firearm or gun
- 3. Safety glasses, goggles or a face shield, as well as a hard hat and hearing protection, are required at all times
- 4. Brace yourself at all times when working on ladders or scaffolds
- 5. Keep tools pointed in a safe direction; never point the tool at a person
- 6. Load powder actuated tools just before use and unload them as soon as you have completed your work. Do not carry loaded tools from job to job
- 7. Do not leave any loaded tools unattended
- 8. Do not allow bystanders near the work. Shields for protecting workers against a possible ricochet should be set up if any other personnel are working in the area.

Care of powder actuated tools:

- 1. Clean and maintain tools according to the manufacturer's instructions
- 2. Check tools before using to ensure that they are in good working order
- 3. Tag defective tools "Out of Service" and remove them from service until they are properly repaired
- 4. Store tools and cartridges in the designate locked containers when they are not in use. Ensure that the tool is unloaded before it is stored

How to use the tools safely:

- 1. Use the tool at a right angle to the work surface
- 2. Check the chamber before using to ensure that the barrel is clean and free of any obstructions
- 3. Do not use the tool where any flammable or explosive vapors, dust or similar substances are present
- 4. Do not place your hand over the front (muzzle) end of the

loaded tool at any time Use of charge cartridges:

- 1. Use only the cartridges recommended and provided by the manufacturer
- 2. Check that the color of the cartridge is appropriate for the work. Charge cartridges are color coded to show their strength
- 3. Conduct a trial by using the weakest or lowest strength charge cartridge first
- 4. In case of a misfire. The operator shall hold the tool in the operating position for at least 15 seconds. Keep the tool pointed in a safe direction and unload the cartridge with extreme caution
- 5. Use caution when using tools near live electrical circuits. Make sure that the nails do not enter any live circuits buried or hidden in the base material
- 6. Do not attempt to force a cartridge into any tool
- 7. Do not discard unfired cartridges carelessly. Return them to the safety director to proper disposal
- 8. Do not carry cartridges loose or in a pocket. Carry them only in the package provided by the manufacturer

LIFTING SAFTEY

Lifting is an everyday task exposing us to risk injury from strains, sprains ,hernias, ect. which cause insurance claims and increased costs. You can help minimize these risks by learning to lift properly and training employees to follow these guidelines:

- 1. Never lift a heavy or bulky load by yourself. Get help to reduce risk of injury.
- 2. Take the safest, not the shortest route. Be wary of tripping or slipping hazards and clear your path before you lift the load.
- 3. Bend your knees while you keep your back straight, not necessarily vertical but straight. Never lift with a rounded back and straight legs.
- 4. Get a good firm grip on what you're lifting and use your whole hand (not just your fingertips). Keep the object close to you and your weight centered over the balls of your feet.
- 5. Keep your elbows and arms in close for more power. Lift with your legs use slow easy motions. Using quick or jerky motions increases your risk of injury.
- 6. Avoid shifting or repositioning the load. Set the load down and regrip from the ground.



"A WINDOW TO SAFETY"

Kennedy Glass Safety Manual, revised 2021

Lock out/Tag out

Prior to use of any tools or equipment, an inspection shall be conducted to assure that the equipment is in safe and proper working condition. This inspection shall include:

- 1. Electrical cord in proper condition with all wires (including grounds) in like-new condition
- 2. On/off switch and any emergency shutdown switches or devices in good condition and working properly
- 3. All guards and protective devices in place as provided by the manufacturers, and in like-new condition
- 4. All accessories tightened and properly adjusted for safe operation
- 5. General operating condition is good, with no compromising damage or wear

Should any substandard condition be found, the equipment shall be "tagged" immediately, and be taken out of service for repair or replacement. Lock Out/Tag Out tags shall be provided in each work vehicle and in the primary work facility for use by all personnel.

Once tagged and removed from service, the equipment shall be forwarded to the Shop Manager for evaluation, then repair or replacement. The Lock Out/Tag Out tag shall not be removed from the tool or equipment until it is tested and deemed safe and operational by qualified personnel. All equipment containing stored energy shall be locked or caged prior to repair, and until the equipment is compliant and ready for use.

At least annually, a comprehensive review shall be conducted to assure that all safety policies, as well as the "Lock out/Tag out" policy, are being followed. This review shall be completed by the Safety Director and shall include a full review of any necessary action by the President.

Employee training shall be conducted on a regular basis and/or during any job reassignments to ensure that employees are aware of this policy and understand the importance of adherence.

Fork Lift Use and Training

Forklifts are only to be operated by qualified personnel who have successfully completed forklift training and are certified to operate the equipment.

Formal forklift training is conducted by a training professional at least annually. This training consists of both classroom training and practical training, with instructor demonstrations and trainee exercises to ensure that personnel understand the principles of lifting materials and the complete operation of the equipment.

Upon successful completion of this training, each trainee will receive a certificate of completion and an operator's card, and will be logged into the Kennedy Glass employee safety certification information system.

A forklift inspection shall be conducted prior to each use to assure that all tires, guards, alarms and lights are in proper operating condition. Should a compromised condition be found, the equipment is to be tagged and the supervisor notified as soon as possible. Do not operate the equipment.

Ergonomics and Work Methods

Kennedy Glass is committed to making the work we perform as convenient, comfortable and efficient as possible. Whenever possible and practical, equipment and methods shall be employed to lessen lifting loads and repetitive actions.

Work methods for protecting our muscular and skeletal systems are addressed and discussed at least quarterly during Tool Box Talks. These include lifting techniques, repetitive motion hazards, fatigue, material handling and work surfaces.

For personnel working in the office environment, ergonomic office furniture shall be used, along with accessories which help to minimize repetitive motion hazards.

Heat/Cold Stress

Working outside throughout the year results in exposure to extreme heat in the summer and cold temperatures in the winter. Care must be taken by employees to ensure that the proper clothing is worn, they are well-rested, and their bodies are hydrated to help retain heat in the winter and dissipate heat in the summer.

Heat and cold stress is the subject of regular tool box talks. This education includes, but is not limited to, signs and symptoms, actions as a result of symptoms, proper nutrition and clothing.

Heat Stress

Heat stress results from excessive heat in the body. Signs of heat stress may include:

- 1. Heat rash
- 2. Cramps
- 3. Exhaustion
- 4. Heat stroke

Kennedy Glass provides water coolers, ice and water for proper hydration. When possible, workers are directed to move to shaded work areas during the heat of the day, and to take breaks at a frequency that is necessary to avoid the dangers of overheating.

Cold Stress

Cold stress results from the inability of the body to remain warm. Signs of cold stress may include:

- 1. Numbness
- 2. Aching
- 3. Tingling or stinging in the hands or feet
- 4. Redness and itching of the skin

Workers are encouraged to wear appropriate clothing with proper layering, underwear, etc. Actions to help with exposure include frequent short breaks in warm shelter, setting up wind screens or moving to areas which are blocked from the wind, and, in some cases, tenting and heating the work area. Kennedy Glass provides hand and foot warmers during extreme cold temperatures.

Enforcement and Discipline Policy

A. POLICY

Each employee is accountable for their own participation in this safety program. Kennedy Glass Partners, LLC, provides the training, equipment and guidance to work safely; but, it is up to the individual worker to ensure that they follow this guidance and uses all equipment in a safe manner. Non- compliance by employees could result in the following disciplinary actions. Violation free for a period of 90 days returns the employee to first violation status.

FIRST VIOLATION:	Verbal warning, documented
SECOND VIOLATION:	Written warning
THIRD VIOLATION:	Three day suspension
FOURTH VIOLATION:	Further disciplinary action up to and including termination of employment.

B. AUTHORITY

Any supervisory personnel may document in writing a report of violation. The Kennedy Glass Partners, LLC "Employee Disciplinary Report" should be used for this purpose. Distribution of the form should be made as follows:

Original: Warned Person

Copy 1: Kennedy Glass Partners, LLC, Field File

Employee Reprimand

Work Location	Date of Discipline Action Given
Date of Occurrence	Issuing Supervisor
	Work Location Date of Occurrence

Violation Statement

Place of Violation:	
Date of Violation:	
Description of Violation:	

Disciplinary Action

Administrative Leave w/Pay	\Box - Recommendation for Termination
- Sent Home w/Pay	- Suspension Without Pay Days
🗆 - None	Other

Corrective Actions

Description of Corrective Actions to be Taken:

 \square - I have read this Notice of Discipline and understand it.

Employee's Signature	Print Name	Date
Employee refused to sign	this form and all attached doo	umentation.

Record Keeping

A. ADMINISTRATIVE ASSISTANT

The Administrative Assistant is responsible for completing and maintaining all IOSHA record keeping requirements. These include but are not limited to the following:

- 1. Receive initial accident reports from the field.
- 2. Post all recordable injuries to the OSHA 300 log.
- 3. Posting and closing out the OSHA 300 log at the end of each year.
- 4. Complete the Indiana State Form 34401, Employer's Report of Injury/Illness of Employees.
- 5. Maintaining and providing any pre-qualification data that may be required as a prerequisite for bidding certain projects.
- 6. Complete and submit any workman's compensation forms to the insurance company.

B. OSHA FORM 300A

- The OSHA Form 300A will be posted in the shop at all times.
- Each year during the month of January, the Administrative Assistant will close out the OSHA form 300. THE PRESIDENT WILL ENSURE THE FORM IS POSTED. This is an OSHA requirement.
- For help with the OSHA form 300 please reference the OSHA website at https://www.osha.gov/sites/default/files/OSHA-RK-Forms-Package.pdf

Toolbox Talks

GENERAL

The Glazing Superintendent will ensure that weekly Safety Toolbox Talks are conducted. These meetings are to be held at the beginning of each week. This provides the supervisor time to remind employees of the hazards associated with the type of work that is going to be conducted for the week. It also provides the opportunity to update employees on the most current safety policies and regulations.

Site-Specific Training -

All employees will be briefed on their safety responsibilities, safe work practices, and Contractor safety policy when they arrive on the job. This does not have to be a long drawnout class but should rather be more hip pocket training style in order to keep safe practices fresh in mind.

Specific duties include:

- 1. The Safety Official will explain and enforce safety policies. This explanation includes:
 - a. Reviewing this safety manual.
 - b. Reviewing any special hazards of the project and provisions for special training and equipment.

2. The Glazing Superintendent will explain safety policies. This explanation will include:

- a. Briefing on the KENNEDY GLASS safety expectations.
- b. Reviewing emergency and medical procedures.
- C. Discussing special safety hazards on the job.
- d. Instructing them on accident reporting procedures.
- e. Reviewing training methods and procedures, stressing the responsibility for the safety of the crew.

- f. Reviewing procedures for safety policy enforcement.
- 3. The crew leader will explain the safety policy to their crews. This explanation will include:
 - a. Explaining KENNEDY GLASS's concern for safety and our procedures for safety policy enforcement
 - b. Discussing specific tasks and explaining step-by-step, how to do each part safely.

Training Procedure - A simple, basic format for successful training follows:

EXPLAIN what has to be done. DEMONSTRATE what has to be done. WATCH EMPLOYEE do it. REPEAT if necessary.

Remember that each individual learns at a different speed. Our job is to be sure that the training works regardless of language barriers, personal factors, or other problems.

Training Assistance - The Safety Official is always ready and willing to help with training. All it takes is a phone call when you want help from outside agencies, training materials, or personal assistance.

Meetings

Management and employees working together can identify, understand, and correct unsafe working conditions. Safety is an important aspect of good workmanship and should be included in all meetings concerned with the work. In addition to this, safety will be specifically discussed at the following:

A. Daily Safety Task Analysis

The Glazing Superintendent or crew leader should hold daily safety task analysis as part of their daily production meetings.

B. "Toolbox" Safety Meetings

Glazing Superintendent or Crew lead will conduct a short safety meeting with their crews each week. After each meeting they should complete the **"Safety Meeting Attendance Record"** and have all in attendance sign the report. The original report should be kept on file at the project site. One copy of this form is to be returned to the office for filing.

The following guidelines for these meetings should be followed.

- 1. Keep the meeting moving fast.
- 2. Start and stop on time.
- 3. Use illustrated materials and demonstrations.
- 4. Cover one topic at a time and do it well.
- 5. Try to get everyone involved.
- 6. Review any recent injuries.
 - i What was the injury?
 - ii How did it happen?
 - iii How can it be prevented next time?
- 7. Review safety hazards seen the past week.
 - i What was the hazard?
 - ii Why was it dangerous?
 - iii How has it been handled and abated?
- 8. Review the work plans for the coming week.
 - i What will the hazards be?
 - ii Who will be affected?
 - iii How will they be handled?

C. SUBJECTS

The primary subject is assigned for each week. These subjects will provide a wellrounded safety education and refresher training; but, do not provide the necessary job specific information a good Tool Box Talk needs. The Crew Leader and other employees must look around the project and identify potentially hazardous situations and provide reminders and safety instruction on these items as well. These subjects will be entered midway down the form. Suggested Classes are as follows:

- 1- Bloodborne Pathogens
- 2- Silica and Asbestos
- 3- PPE
- 4- Hazardous Materials (HAZWOPER) and SDS's
- 5- Hand and Power tool safety
- 6- Lockout Tag out
- 7- Fire prevention Office safety (slips, trips, falls and ergonomics)
- 8- Scaffolding/latter safety and Fall Protection
- 9- OSHA record keeping and reporting
- 10- Motor Vehicles safety and emergency first aid kits
- 11- Hot and Cold weather injury prevention
- 12- Hazard ID and on site Hazard mitigation
Subcontractor Safety Responsibilities

Any subcontractor used for work provided by Kennedy Glass shall be qualified prior to use of Kennedy Glass LLC equipment. This qualification shall include at least a verbal discussion of our safety policy and expectations to ascertain that this working partner can perform in a safe and efficient manner. Upon qualification, all subcontractors shall be provided with a copy of the Kennedy Glass Safety Manual.

Prior to work on any Kennedy Glass job, the subcontractor shall designate its on-site safety representative, and provide SDS sheets for all hazardous materials or chemicals used on site. These documents shall be maintained on site with a copy of each placed in the appropriate binder.

When practical, subcontractors will be required to attend weekly tool box talks.

All subcontractors are required to use safe work practices and follow all directives, policies and procedures contained in this safety program.

Incident Reporting and Analysis

Kennedy Glass has implemented the following Incident Reporting and Analysis Program to achieve various objectives that will improve our safety performance and keep our employees healthy. The critical components of this program will be the quick reporting of injuries by employees and an analysis to determine what could be done differently in the future to prevent the accident from happening again. By determining the causes of incidents, we will be able to incorporate engineering and administrative controls into our processes to reduce the potential for injury to our employees or damage to equipment or property.

Reporting Process

In the event of an injury, near miss, property damage or chemical spill, the employee is to report the occurrence to his or her supervisor immediately. Failure to report injuries when they happen may be reason for disciplinary action.

The Crew Leader will be responsible for informing employees of the procedure for reporting accidents. He or she will also be responsible for completing any documentation regarding the mishap. Employees will also be instructed during the "New Employee Safety Orientation" on the procedures to follow in the event of an accident.

Analysis Process

So that we may prevent future incidents from occurring, any incident that involves an OSHA recordable, near miss, property damage or a chemical spill will be analyzed to determine the cause of the event. The Crew Leader will initiate the process by completing the Accident Investigation Report in Appendix A. This report must be submitted to upper management within 24 hours of knowledge of the incident.

All supervisory personnel will be trained and educated on proper incident analysis techniques by upper management, and should take the opportunity to review any findings with their employees to better educate them on the hazards they may encounter in their daily activities.

Every accident must be investigated thoroughly. The Glazing Superintendent and Safety official will investigate all accidents, as soon after they occur as possible, following these steps.

1. Notify Management and Safety immediately.

- 2. Interview and make a record of the statements of the injured employee, the employee's supervisor, and any witnesses. The Glazing Superintendent's observations should also be recorded. Weather conditions, time of day, condition of site, and equipment, personal factors, and other observations should be discussed in these interviews. If the media arrives, inform them that Management has been contacted, and the appropriate spokesperson is in route. Tell all employees not to offer information about the jobsite or accident.
- Complete the "Supervisor's Accident Report" which is located in the appendix section of this manual, or applicable insurance Contractor accident report (i.e. auto, liability, etc.) being sure to answer <u>all</u> items. The information below (See #5 Pointers) can be used to help describe the situation on the "Supervisor's Report."
- 4. Photograph the accident site, any equipment involved, and the general condition of the job. A cell phone video camera is fine but please ensure it is viewable in detail, please contact the Safety Official.
- 5. Ensure to collect the five W's of information and follow the guide.

Purpose

- a. To find out **how** the accident happened
- b. To find out **why** it happened
- C. To **prevent** its happening again

Ask Yourself

- a. What **object** or substance caused the damage? (such as a utility knife)
- b. What **part of the object** did the damage? (such as the cutting edge)
- c. What **kind** of accident was it? (such as laceration)
- d. What was the **unsafe** mechanical or physical **condition**? (such as a dull blade)
- e. What was the **unsafe act**?

(such as not wearing gloves)

f. What was the unsafe **personal factor**? (such as lack of skill)

The Investigation

- a. Be Timely **Investigate all accidents.** Minor accidents will not require the detailed investigation of the serious cases. However, the longer you delay, the more difficult it will be to get the information.
- b. INVESTIGATE FOR PREVENTION The primary objective of an accident investigation is to find a way to prevent it from happening again, it is not a witch hunt.
- c. INVESTIGATE AT THE ACCIDENT SCENE Take careful notes and **investigate the scene** before you talk to the injured employee or witness. Attempt to reconstruct how the accident happened. List any unusual occurrences, out-ofplace objects, or missing safeguards.
- d. GET THE FACTS All of them! An investigation that has **all the facts** makes it highly likely that your evaluation of them will be accurate and acceptable.
- e. PLAN AND PREPARE FOR YOUR INTERVIEW The more facts you have at your disposal, the clearer your idea will be of what you are trying to discover. Your **objective is to keep an open mind and conduct an impartial investigation.** Therefore, if you give the person you are planning to interview a short rundown on the facts you have in hand, he or she will probably give truthful replies to your questions.
- f. LET THE VICTIM TELL THEIR STORY It is usually best to interview the accident victim soon after the accident; you are more likely to get truthful answers to your questions. Calm victims and witnesses and you will get answers.

Hazard Communication Program

INTRODUCTION

- Hazard Communication and "Right-to-Know" laws are broadly classed as Chemical concerns. These include chemicals, noise, radiation, vibration, and biological hazards. "Right-to-Know" laws vary from state to state. Know where you are conducting business and the local regulations that govern them.
- 2. This program has been prepared to comply with the requirements of the Federal OSHA Standard 1926.59 and to ensure that information necessary for the safe use, handling and storage of hazardous chemicals is provided to and made available to all employees.
- 3. This program includes guidelines on identification of chemical hazards and the preparation of proper use of container label, placards and other types of warning devices. This written program will be made available at all times to employees of Kennedy Glass Partners, LLC, employees of other contractors sharing the same job site and any OSHA compliance officials.

As of January 1, 2014 HAZCOM is beginning the incorporation of the Global Harmonization System (GHS), a multi-year transition from MSDSs to SDSs and Labeling system utilizing pictograms (see below).

- 1. Collect the Safety Data Sheets (SDS) for each hazardous chemical to be used on site and put them in the Right-to-Know manual. Chemicals are not allowed on site without this sheet.
- 2. A complete, current inventory of all the hazardous substances on the site must be kept in the SDS manual. This inventory must include the amounts of the material purchased, the amount on site at any time, and the amount disposed of along with the dates and places of purchase and disposal.

Access to 24/7 "Emergency Use Only" to the 3E Contractor for obtaining a SDS.



3. Each employee must be trained on the HAZCOM Program. This training must include:

- a. A statement of the unconditional right to know about any hazards that they might be exposed to.
- b. The right to refuse to work if they believe a hazard exists or if they haven't received proper training and equipment.
- c. The right to read any information about hazards on the site.
- 4. Employees who will be exposed to hazardous material will also:
- a. Be trained to work safely with the material.
- b. Review the SDS sheet for the material and labeling requirements.
- c. Be told the health problems that can be caused by the material.
- d. Be issued the needed safety equipment and be able to use it.
- 5. After employees have received the proper HAZCOM training, they must sign the log sheet kept in the SDS manual.
- 6. All hazardous substances must be stored in properly labeled containers with the name of the material, appropriate hazard warnings, name and address of manufacturer, and any department or transportation or other labels that may also be required.

NEW GHS Pictograms for container labeling:



1) carcinogenic, germ cell mutagenic, toxic to reproduction / 2) specific target organ toxicity

A. HAZARDOUS CHEMICAL INVENTORY LIST

- 1. Kennedy Glass Partners, LLC has prepared this program for <u>ALL WORK SITES</u>. It contains a list of hazardous chemicals that will be always current and continually maintained. This list will be kept in company trucks.
- 2. The Safety Official is responsible for compiling and maintaining a list of all hazardous chemicals that are initially or anticipated to be sent to a jobsite. As hazardous materials are brought onto the work site by Kennedy Glass Partners, LLC, the foreman should update the hazardous chemical inventory list. The Crew Leader should ask the foreman for a copy of all hazards present that could lead to issues for his crew.

Chemicals can affect us through our skin, eyes, lungs, or by getting on our food or cigarettes. It is our job to protect ourselves from these hazards by using proper clothing, gloves, goggles, and respirators. Good personal hygiene and common sense will also help. *All products used must be used to keep employee exposure below the listed Permissible Exposure Limit (PEL) which is listed on the products SDS.*

- 1. <u>Oils and Lubricants</u>: These can cause a skin condition called dermatitis. Some might contain additives that have more serious effects like cancer. Protective gloves and clothing must be worn when applying these materials. Respiratory protection may be required when they are sprayed, heated, or burned. Consult the Project Manager for additional help or information.
- 2. **Fuels Gasoline and Propane:** The primary danger with these chemicals is fire and explosion. The Superintendent should explain each of the following rules to each employee using or dispensing fuels:
- a. Never use fuels as solvents.
- b. Keep fuels only in approved containers in good condition.
- c. Store fuels in properly designed storage areas, not areas of work, which are away from any sources of ignition.
- d. Review the codes governing the storage of fuels.
- e. Provide adequate fire protection.
- f. Notify the local fire department of how much fuel is on site and where it is located, if large amounts are stored or dangerous conditions or amounts are present.
- 3. <u>Paints and Coatings:</u> There is a wide variety of paints and coatings in use, and they have different levels of toxicity. If there are questions about the hazards of a product, ask the Material Suppliers for more information.

Different kinds of protection are needed depending on the product that will be used. Skin and eyes should be protected with gloves, clothing, and goggles wherever contact is possible. Respirators must also be used if vapors can accumulate. With products other than latex paints, airline respirators may also be needed. Materials that may be toxic include the following:

- a. Oil Base Paints
- b. Epoxies and Urethanes
- c. Varnishes and Shellacs

- d. Concrete Sealers and Coatings
- e. Cold Galvanizing
- f. Treatments for Wood, Plastic, or Meta
- g. Coatings that are Sprayed, Troweled, Brushed, or Poured
- h. Floor Coatings
- i. Primers and Bonding Agents
- 4. <u>Caulks, Mastics, and Glues</u>: Skin irritation and eye injury are the main hazards with these products. Some products can cause cancer with repeated skin contact. Occasionally, toxic fumes will be a problem, especially in confined spaces. This is particularly true of petroleum and formaldehyde-based products and epoxy. Silicones are strong eye irritants and Cyanoacrylates (Super Glues) can bond skin on contact and cause immediate blindness if they contact the eye. Gloves must always be used to prevent contact with the skin. Goggles or Face shields with Safety Glasses must be worn if there is any chance of eye contact.

Staying clean is the best defense. Clean hands will not contaminate eyes, contact lenses, or food. Always ensure proper hand washing facilities or means are provided.

5. <u>Solvents</u>: Solvents often produce toxic vapors that make respiratory protection necessary. Some are so toxic that special air-supplied respirators must be used. Most are harmful to the skin. Many are very flammable.

The hazards associated with solvents are even greater when they are used in areas with poor ventilation or in large quantities. Protective clothing and respirators are minimum precautions. Always use products outside if possible. The Material Supplier should be consulted with any question on proper handling or storage.

6. <u>Acids and Bases</u>: Hydrochloric acid, also called muriatic acid, can burn the skin and eyes, and create toxic fumes that can cause permanent lung damage. It is often used as a brick cleaner and for other jobs such as etching. Acids and bases can cause skin burns and must only be used with proper gloves, goggles, and respirators. These products include:

- a. Chlorine solution for tank cleaning
- b. Brick cleaners
- C. Etching solutions
- 7. <u>Cement, Mortar, and Grout</u>: Even though these materials aren't toxic, prolonged exposure can cause lung damage and severe skin burns. Because eye contact can cause blindness, goggles should always be worn. Where dust will be produced, respirators should also be used. Employees whose job involves prolonged contact must wear rubber gloves and protective clothing. When skin is exposed, the material should be washed off immediately. Remind the employee to stand upwind if possible to avoid dust exposure.
- 8. <u>Sand Blasting, Dust, and Welding</u>: Sandblasting sand normally contains silica, as does much of the dust formed during general cleaning and demolition work. A dust mask or respirator must be worn and, in the case of sandblasting, only air-supplied hoods are allowed with barricaded areas to prevent unauthorized entry.

Welding fumes from cutting or welding cad-plated, galvanized, or coated metals can be toxic, producing fume fever, brain damage, cancer and other ill effects depending on exposure. Ensure proper ventilation is provided by opening work areas to outside air or use fans if possible.

Cutting and welding in confined spaces should be done only with the approval of the Superintendent. Oxygen deficiency, high fume concentrations, and explosion hazards can exist. Contact the Project Manager if Air Monitoring is needed before beginning or proceeding with work.

* See "Confined Space".

9. <u>Toxic Gases:</u> Hydrogen sulfide and carbon monoxide are the two most common gases that pose problems. Hydrogen sulfide is usually encountered when connecting into sanitary sewers and in some industrial settings like paper mills and refineries. It is extremely dangerous, because it impairs the sense of smell at about the same level it becomes highly toxic. Workers have no warning of being exposed.

Carbon monoxide is most commonly found as exhaust from combustion such as heaters, cars, compressors, or other equipment. It can cause problems during heated concrete pours and when working in confined spaces with mobile equipment.

Safety Suppliers or outside agencies have equipment available to rent and should be consulted when the possibility of air contamination exists before beginning work.

10. <u>Asbestos</u>: There are many severe health hazards involved in working with asbestos. It is KENNEDY GLASS policy that no employee is to be involved in work with asbestos materials. This includes demolition, removal, repair or installation. When possible, work involving asbestos abatement or removal should be complete before we start work on a project. If that is not possible, asbestos abatement will be done by pre-qualified asbestos abatement contractors. KENNEDY GLASS may have to ensure an assessment of all work areas where asbestos is or could be present, which would include any buildings or structures built before 1980.

CONTAINER LABELING

- 1. All chemicals on site will be stored in their original or approved containers with a proper label attached. Any container not properly labeled should be given to the Crew lead for labeling or proper disposal.
- 2. Workers may dispense chemicals from original containers only in small quantities for immediate use. Any chemicals left after work is completed must be returned to the original container.
- 3. No unmarked containers of any size are to be left in the work area unattended.
- 4. Kennedy Glass Partners, LLC will rely on manufacturer applied labels whenever possible, and will ensure that these labels are maintained. Containers that are not labeled or on which the manufacturer label has been removed will be relabeled.
- 5. Kennedy Glass Partners, LLC, specifically the Crew Leader, will ensure that each container is labeled with the identity of the hazardous chemical contained and any appropriate hazardous warnings.

SAFETY DATA SHEETS

1. Copies of the Safety Data Sheets for all hazardous chemicals to which employees may be

exposed are kept in a binder clearly marked "SDS Sheets", and are readily accessible to employees in each work truck when new products are introduced to the jobsite, the SDS will be added to the binder. Employees working with hazardous chemicals may request a copy of the safety data sheet (SDS). Requests for SDS should be made to the Crew Leader of the project.

2. A standard chemical reference may also be available on the site to provide immediate reference to chemical safety information.

EMPLOYEE TRAINING

Employees will attend a training session on hazardous chemicals as part of the toolbox talks. These training sessions will cover the following:

- 1. An overview of the hazard communication requirements.
- 2. A review of the chemicals present in their work place operations.
- 3. The location and availability of the Kennedy Glass Partners, LLC written hazard communication program and a list of the hazardous chemicals and their SDS sheets.
- 4. Methods and observation techniques that may be used to detect the presence or release of hazardous chemicals in the workplace.
- 5. The physical hazards of the chemicals in the workplace.
- 6. The health hazards of the chemicals in the work area, including signs and symptoms of exposure and any medical condition known to be aggravated by exposure to the chemical.
- 7. How to lesson and prevent exposure to hazardous workplace chemicals by using good work practices, personal protective equipment, etc.
- 8. Emergency procedures to follow if employees are exposed to hazardous chemicals.
- 9. An explanation of our hazard communication program, including how to read labels and MSDS sheets to obtain appropriate hazard information.

PERSONAL PROTECTIVE EQUIPMENT

- 1. Required personal protective equipment is available by contacting the project Crew Leader.
- 2. Any employee found in violation of personal protective equipment is subject to disciplinary actions up to and including discharge.

EMERGENCY RESPONSES

- Any incident of over exposure or spill of a hazardous chemical/substance must be reported immediately to the Kennedy Glass Partners, LLC, Glazing Superintendent.
- 2. The Crew Leader or the immediate supervisor will be responsible for ensuring that proper emergency response actions are taken in leak/spill situations.

HAZARDOUS NON-ROUTINE TASKS

- 1. Prior to any such work involving possible exposure to hazardous chemicals, the Glazing Superintendent will inform employees of the hazards.
- 2. Review of safe work procedures and use of required PPE will be conducted prior

to the start of such tasks. Where necessary, areas will be posted to indicate the nature of the hazard.

INFORMING OTHER EMPLOYEES

- 1. Other on-site employees are required to adhere to the provisions of the Hazardous Communications Standard.
- 2. Information on hazardous chemicals known to be present will be exchanged with other employers. Employers will be responsible for providing necessary information to their employees.

OSHA ON SITE

It is Kennedy glass policy to fully cooperate with inspections by enforcement agencies such as the Occupational Safety and Health Administration (OSHA).

The following guidelines must be followed when an OSHA or other agency representative arrives at our project:

Inspections: What to do when a Compliance Officer arrives at the jobsite. Use the OSHA Inspection Questionnaire at the end of this section as a guide.

- 1. When OSHA Inspector arrives
- 2. Call Safety or Glazing Superintendent and management
- 3. Be courteous, and cooperative do not argue with inspectors.
- 4. Take notes and when the inspector takes photos you too should take a photo.
- 5. IF YOU CAN, CORRECT ANY VIOLATIONS IMMEDIATELY!

Get a copy, of the Compliance Officer's work assignment for your site (usually a building permit or Dodge Report, or a copy of a complaint.) KENNEDY GLASS may want to contest an alleged violation, so record all pertinent information. The names, business affiliation and addresses of all people present should be written down.

If a complaint is involved, you should ask:

- If the party(s) filing the complaint requested that their name be withheld. If they made no such request, then the disclosure of the name of the party initiating the complaint is allowed.
 - Whether the complaint was filed by a present or past employee, customer, subcontractor, material supplier, or by a person not directly employed around the workplace involved; the answers to these questions may be extremely important to us. In most cases, an inspection should not be permitted if the complaint was filed by someone other than present employees or their representative, unless the complaint involves an imminent danger situation.

Ask the Inspector the nature of the inspection.

OSHA has established the following system of inspection priorities:

Imminent Danger situations are given top priority.

Catastrophes and Fatal Accidents: Investigation of fatalities and accidents hospitalizing three (3) or more employees are second priority. OSHA must be notified within eight (8) hours. Amputations, Loss of an eye OR hospitalization must be reported with twenty four (24) hours. Investigations are made to determine if OSHA standards were violated and to avoid recurrence of similar accidents.

- **Employee Complaints:** Written and signed complaint by current employee. If it is a complaint, ask for copy. (Inspections should include <u>only</u> the area of complaint accessed by the most direct route don't give us a second violation by being where you shouldn't.)
- **Programmed High Hazard Inspections:** A special program that targets inspections at the most dangerous workplaces.
- **Other Programmed Inspection** (also referred to as **General Inspection**): Randomly chosen low-hazard and non-manufacturing sites.
- **Follow-up Inspections:** Re-inspection of earlier inspections to determine whether previously cited violations have been corrected.
 - **Other types** of inspections could include: referrals, fax complaints, or focused inspections (very limited).

Opening Conference

•

The Opening Conference may begin prior to the arrival of the Safety, **Glazing Superintendent**, or other designated KENNEDY GLASS representative. You may ask the inspector a delay of up to *1 hour* to wait for the appropriate KENNEDY GLASS representative to arrive.

Before starting the inspection, the Compliance Officer should explain the nature of the inspection, the general scope, and outline records to be reviewed and any employees to be questioned. You should request permission to notify the customer, other contractors ect, that an OSHA inspection is underway at the jobsite.

The Compliance Officer will ask questions necessary to obtain information to complete the inspection, such as:

• Number of Employees

- Number of Injuries/Illnesses at site
- Name and address of subcontractor(s)
- Hazard Communication Program Material Safety Data Sheet &/or Safety Data Sheets (SDS/SDS)
- Size of Project Dollar Amount
- Length of Project Completion Date

Be friendly and answer the questions you have answers to, DO NOT GUESS! Please do not offer any additional information that is not requested of you. The last thing you need is to get yourself into trouble over an issue that was not previously present. <u>It is your fifth</u> <u>amendment right not to incriminate yourself in court so don't do it now</u>.

The Inspection

Again it is appropriate to ask the Inspector to wait until the designated representative can be notified. OSHA will allow up to one hour, or as reasonable.

The following individuals shall be contacted in the event an OSHA Compliance Officer shows up on a jobsite:

NAME	TITLE	TELEPHONE
Jeff Sprear	Safety Official	785-760-1680

If the Inspector is seeking to inspect without probable cause or to make an unreasonable inspection of the jobsite, consider requesting the Inspector to obtain a search warrant in order to enter a jobsite. We will not require that the Inspector obtain a warrant before permitting entry <u>under normal circumstances</u>.

<u>Probable cause</u> for an inspection exists if the employer has been selected for an inspection by a neutral process (a programmed inspection), if an accident has occurred, if an employee compliant has been filed, or if an Inspector has witnessed a violation from outside the premises. In all these situations (other than a programmed inspection), probable cause to inspect exists only to the extent and scope required to investigate the accident, complaint or violation at issue and a copy of the inspection prompting paperwork should be provided to the Contractor. We may resist efforts to expand an inspection beyond the circumstances for which there is probable cause by requesting a search warrant.

A. Rights to Reasonable Inspection

The OSHA Act guarantees employers the right to a reasonable, orderly and fair inspection. The inspection must be:

- 1) At a reasonable time
- 2) To inspect within reasonable limits
- 3) In a reasonable manner
- 4) To question a reasonable number of employees if there is not an authorized representative of employees.

If the investigation involves a complaint, the Compliance Officer may inspect and interview only with respect to matters reasonably related to the complaint. After preliminary investigation, if you believe that a request is unreasonable, you must use careful judgment and good faith in handling the situation.

You can discuss the matter with the Compliance Officer and explain why you think the request is unreasonable. If they insists on the request, then you may ask the Inspector to wait until Management can be consulted. If you have strong convictions that the request is unreasonable and unnecessary, you should consult with the KENNEDY Glass Glazing Superintendent, Safety Official or another designated KENNEDY GLASS representative before proceeding. There will probably be other areas that the Compliance Officer may wish to inspect while Management is making a decision.

Avoidance of Disruption

The United States Department of Labor's regulations direct Compliance Officers to conduct investigations to avoid any undue and unnecessary disruption of the normal operations of the employer. You should inform the Inspector of the day's schedule and assist him/her in conducting the investigation in a manner least disruptive of work.

B. Inspection Procedures

This is an employer's right and a most important one, since in most cases you may be the only spokesperson for the Kennedy Glass during the inspection, as well as the eyes and ears of Management for any contest proceeding later. The Kennedy Glass representative is to accompany the OSHA Inspector

to the site to be inspected by the most direct route, providing the fewest additional opportunities for unrequested inspections. The OSHA statute gives the Compliance Officer the authority to interview employees, privately if they wish, and to examine machinery or equipment. The Compliance Officer is also permitted to take photographs, use a video camera, take samples, and to use other reasonable techniques. You should also take pictures and samples as near to those of the Compliance Officer as possible.

TAKE NOTES: It is imperative that you take as complete a set of notes as possible,
identifying areas visited, equipment and material examined, Employees
interviewed and a written description of each <u>ALLEGED</u> hazard. There is
nothing wrong with taking notes during the investigation.
On top of all notes you take, handwrite the following: "Confidential
Attorney Work Product - Made in Anticipation of Litigation."

Representatives Authorized by Employees

- The OSHA statute provides the right for an employee representative to accompany the Compliance Officer.
- This person is often a Supervisor, or an appointed safety representative. The statute further provides, in the
- absence of an authorized employee representative, the Compliance Officer "shall consult with a reasonable
- number of employees concerning matters of safety and health in the workplace."

Post-Inspection Procedures

A. The "Closing Conference"

After an Inspector completes the inspection, a closing conference is conducted with the Employer representative. The inspector is to <u>informally</u> advise you of any apparent violation. This closing conference is important; do not agree that you violated the act or any standards during the closing conference. Any admission of violation of the OSHA Act will be noted by the Compliance Officer and can be used against Kennedy Glass at a later date.

If the Inspector believes a violation may have occurred, they may tell you they do not know if you will be cited for conditions, but ask how long it will take to correct those same conditions. You're agreeing to have any and all alleged unsafe condition(s) corrected within

a certain time period and then that becomes your abatement period, if you receive a citation.

The employer has a say in deciding on an abatement date along with the Inspector, The Inspector does not set it alone. The Inspector should ask, when violations can be corrected by. It is up to the employer to insist on an adequate abatement period. If the condition to be corrected is a very minor one and will not be a problem to correct, and if the employer recognizes that it is an unsafe condition, then agree to an early abatement period (i.e., immediate or one day after receipt of citation). If you question the Inspector's reasoning and you feel you are, in fact, in compliance or know that a certain amount of time would be necessary to correct the alleged unsafe condition, then deny a violation and insist on a longer abatement date, usually 15 to 20 days. Remember that the abatement date becomes effective upon receipt of the Safety Order (citation) from OSHA. Even with immediate abatement, the Contractor has one day after the receipt of the citation in which to correct the alleged unsafe condition.

Employers generally receive a Safety Order (citation) about ten (10) to fifteen (15) working days after an inspection, but OSHA has up to six (6) months to issue an employer a citation. It takes this long for an Inspector to write up their report, send it in, and have it go through all the administrative channels. If you wait on citations and agree to immediate or one day abatement, there may not be time to make the correction. Failing to correct within the time allowed may subject us to a maximum penalty of \$7,000 a day for failure to abate.

After the inspection process is over and a citation(s) have been issued, make sure you correct cited violations if you decide not to contest. Re-inspections are becoming more prevalent, due to Federal pressures.

B. Items you may want to point out to the Inspector:

- Copies of "Safety Meetings" or other employee training material
- Copies of "safety warnings to individuals"
- Any other material that would help establishes "good faith compliance efforts."

C. Written Records

If the project is cited for alleged violations, make a written report to the Safety immediately following the closing conference. This report should provide as much detail as possible. For instance, location of alleged violation; what was occurring at the time of inspection relating to the alleged violation; and what sort of investigation techniques or documentation were used by the Inspector.

D. If the Project is cited for alleged violation, note the following items:

The Employer will receive by mail a Safety Order (citation) with a cover letter stating posting requirements. If these are sent to the main office, the Safety official will see to the compliance of all Safety Order requirements. However, if it is determined after review with all concerned, that the Contractor should contest, the Safety official will take the correct steps to do so.

If the Safety Order is sent to the jobsite, it should be forwarded to the Safety Official at the main office it may be expedited.

E. Imminent Danger

If the Compliance Officer concludes that conditions or practices exist that could reasonably be expected to cause death or serious physical harm before the danger can be eliminated, they shall inform the employer or a representative and attempt to get the employer to voluntarily abate the danger. When the danger can be immediately abated without great expense or shutting down the job, do so immediately. However, the Compliance Officer has no authority to shut down the job without a court order. They can often obtain such an order, however, in a matter of hours.

If decided that Kennedy Glass cannot abate the danger without a court order, a Compliance Officer can only leave and report to their office that they are recommending a civil action to restrain or remove the condition.

F. Serious - Non-serious

A Safety Order for violation of a standard is either deemed serious or nonserious. If it is non-serious, no penalty is assessed unless ten or more violations were charged. In this event, penalties from \$420 to \$2,100 may be assessed for each non-serious violation. Penalties for serious violations begin at \$4,550 and go as high as \$12,471.

Read the Safety Order carefully. Especially the date by which alleged violations are to be corrected. If uncontested on a particular violation, it must be corrected by the date so indicated. Failure to correct becomes "Failure to Abate," in which fines may be assessed up to \$12,471 per day for up to ten days, the maximum fine being \$124.709.

G. Contesting Citations

From the day a Safety Order is received regardless of on jobsite or mailed to the office, a period of fifteen (15) working days is allowed in which to contest. We may contest whether the violation occurred, its gravity (serious or non-serious), the amount of the penalty, the abatement period, or any combination thereof. If fifteen (15) working days elapse and no contest has been filed by Kennedy Glass, the Safety Order becomes final and binding and then must pay any assessed penalties and correct all alleged violations.

H. Informal Hearings

During the fifteen (15) working day period in which employers may contest a Safety Order, we may request an informal hearing. However, this request does not extend the 15 working day period while seeking judicial review.

OSHA Inspection Questionnaire

The questionnaire is to be completed while following the OSHA Inspector's departure and returned to the Safety Official ASAP. The purpose of the questionnaire is to help respond to OSHA's request and charges. A copy of the OSHA Inspection Questionnaire is attached in the Appendix section and at the end of this section.

If the Inspector brings another person who is neither a compliance officer, nor an authorized employee representative to participate in the inspection, **you should carefully guestion this person to determine why they are present**.

The best rule to follow is one of common sense. If the person is an equipment expert, and is otherwise a disinterested party to the investigation, you may choose to allow them to participate. If, on the other hand, you feel the individual is questionable concerning matters of safety and health in the workplace, then you may politely ask the outside party to wait until the Safety Official or another designated Kennedy Glass representative can be consulted.

APPENDIX: FORMS

- A- OSHA INSPECTION QUESTIONNAIRE
- B- Aerial & Scissor Lift Checklist Form
- C- Scaffold Inspection Checklist
- D- Employee Warning Notice
- E- Employee Acknowledgment and Emergency Notification Form
- F- Powered Equipment Inspection Form
- G- Alcohol and Drug Abuse Policy Employee Verification Form
- H- Report of Injury / Illness
- I- Respiratory Protection Acknowledgement
- J- Site Safety Audit

APPENDIX A

OSHA INSPECTION QUESTIONNAIRE

"Confidential Attorney Work Product - Made in Anticipation of Litigation." (Also, include this phrase at the top of any notes taken.)

1.	Site location: Job #:	
	Date of Inspection: Time:	
	Name of Compliance Officer:	
	Office Address of Compliance Officer:	
	Your Name:	
2.	Opening Conference: Date: Time:	
	Persons in attendance and Contractor affiliation:	
1) _		
2) _		
3) _		
4) _		
3.	Did you attempt to contact the Safety Official? Yes No	
	What was the result?	
	Did the Compliance Officer have a search warrant? Yes	No
	Was the inspection based on an employee complaint? Yes	No
	If yes, what was the complaint relating to?	

4.	How long did the inspection take?
5.	Were there any photographs, videos, or samples taken? (monitoring of air/noise or other substance)
	Yes No
Det	ails:
6. 7.	Were you advised of any apparent violations?YesNoDid you correct the violations on site?YesNo
8.	Did the Compliance Officer state that a citation would be issued?
	Yes No
9.	List the specific standard number(s) that was stated by the Compliance Officer:
	i
	ii
	iii
	iv
10.	Other problems that you noticed but not a concern of the Compliance Officer:
	i
	ii
11.	Your general comments about the inspection and the Compliance Officer:
12.	Closing Conference Date: Time:
	Kennedy Glass Safety Manual, revised 202

Persons in attendance and Contractor affiliation:

- - -		

APPENDIX B

Aerial & Scissor Lift Checklist Form

DATE: ISPECTOR:				
MODEL NO. Rental: () Yes () No				
TYPE OF EQUIPMENT: () ARIAL LIFT ()) SCISSOR LIFT			
A - Indicates Attention Needed X - Indica	tes Acceptable N/A – Not Applicable			
DECALS: PROPER PLACEMENT & QUANTITY	BATTERY CHARGER SECURE & OPER.			
DECALS: LEGIBILITY	VALVE MANIFOLD (S) SECURE			
BENT BEAM MEMBERS	PUMPS SECURE			
BROKEN WELDS	FILTER SECURE, CHANGE DATE			
ALL FRAME BOLTS TIGHT	OIL LEVEL OK, CHANGE DATE			
WHEEL BOLTS & NUTS TIGHT & COTTERS	ALL WIRES TIGHT ON TERMINALS			
UPPER CYL. BARS IN PLACE & SECURE	ALL SWITCHES SECURE			
LOWER CYL. BARS IN PLACE & SECURE	ALL FUNCTIONS OPERATIONAL			
RETAINING RINGS SECURE ON PIVOTS	EMERGENCY STOP BREAKS ALL CIRCUITS			
EMERGENCY DOWN CABLE SECURE	SLOW SPEED LIMIT SWITCH SET PROPERLY			
EMERGENCY DOWN OPERATIONAL	STEERING PRESSURE SET PROPERLY			
MAINTENANCE LOCKS SECURE & OPERATE	LIFT PRESSURE SET PROPERLY			
BOLTS ON SCISSORS MOUNTING BLOCKS	CHECK ALL FITTINGS & HOSES FOR LEAKS			
ALL RAILS IN PLACE	ALL ROLLERS TURN FREELY			
BROKEN WELDS OR BENT RAILS	BATTERIES FULLY CHARGED			
ENTRANCE GATE CLOSES FREELY	110V OUTLET SAFE & WORKING			
CHAINS IN PLACE & LATCH PROPERLY	D/C MOTOR SECURE			
EXT. PLAT. LOCKS IN STOWED POSITION	CONTRACTOR (S) SECURE			
EXT. PLAT. ROLLS FREELY	GENERATOR & PULLEYS SECURE			
EXT. PLAT. CABLES IN PLACE & SECURE	ENGINE MOUNTS TIGHT			
EXT. PLAT. LOCKS IN EXT. POSITION	FUEL LINES SECURE & FREE OFLEAKS			
POTHOLD BARS OPERATE SMOOTHLY	FUEL TANKS SECURE			
POTHOLE BARS LOCK IN PLACE	REPLAYS SECURE			
POTHOLE BAR LIMIT SWITCHES ADJUSTED	HOUR METER OPERATIONAL			
PLAT. PINS INSTALLED & SECURE	GENERATOR/CONVERTER OPERATIONAL			
STEERING CYL. PINNED	BATTERY INDICATOR OPERATIONAL			
THE ROD SECURE	ENGINE OIL LEVEL OK			
BRAKE PADS SECURE	ENGINE OIL & FILTER CHANGE DATE			
BRAKE CYL. PINNED	ALL SHIELDS & GUARDS IN PLACE			
BRAKES OPERATIONAL	OPERATORS, SERVICE & MAINT. MANUAL			
BRAKES ADJUSTED PROPERLY	FULL BODY HARNESS			
BRAKE LOCK OPERATIONAL	LANYARDS			
BATTERY HOLDS DOWN SECURE	TIRES			
OUTRIGERS	LOCKING DEVICES			
LOAD TEST	STABILITY TEST			

APPENDIX C

Scaffold Inspection Checklist

Location:				
Compete	ent Per	rson(s)	
Name: Inspection/Walkdown Date:				
Scaffold weight load limitations:				
Additional hazard protection systems required protection, rebar caps, hazard signs):	for use	ers (if	any e.g., fall protection, head	
Inspection Item	Yes	No	Comment	
Hazards to scaffold erectors or users associated with the building structure, systems, or adjacent work areas are mitigated.				
Other safety hazards are controlled such as pinch points, hot surfaces, or electrical.				
A completed scaffold status tag is attached near the access point.				
Ladder, stairway, or special design framing is installed for access.				
Scaffold unit is plumb and level, and resting on stable footing and a firm foundation (including base plates on supported scaffolds).				
Diagonal cross bracing is in place to support legs.				
scaffold unit stability where height to base size exceeds a 4:1 ration.				
Working level platform(s) is fully planked between guardrails and secured to prevent movement.				
Indoor scaffold: Pressure impregnated fire retardant wood is used, OR materials that meet the requirements in the Fire Prevention and Life Safety section of the Facility Fire Protection subject area				
(http://sbms.pnl.gov/standard/96/9601d010.htm). Platform is free of debris and slipping/tripping hazards.				
Platform guardrails are firmly in place on all open sides/ends, where required.				
Installed toe boards, screening at the working platform level(s), area barricades, or canopies, provide falling object protection.				
Fall protection is documented and reviewed by scaffold users and erectors, where required.				
The scaffold does not block exits, egress, paths, fire alarms, and fire suppression systems.				

APPENDIX D

Employee Reprimand

Employee	Work Location	Date of Discipline Action Given
Employee ID # (if any)	Date of Occurrence	Issuing Supervisor

Violation Statement

Place of Violation:		
Date of Violation:		
Description of Violation:		

Disciplinary Action

Administrative Leave w/Pay	\Box - Recommendation for Termination
- Sent Home w/Pay	- Suspension Without Pay Days
🗆 - None	🗆 - Other

Corrective Actions

Description of Corrective Actions to be Taken:

 \square - I have read this Notice of Discipline and understand it.

Employee's Signature	Print Name	Date
Employee refused to sign	this form and all attached doo	umentation.
,,,		
,,,		

APPENDIX E

Employee Acknowledgment and Emergency Notification Form

This is your personal copy of the Safety Procedures Manual. You are required to read, understand, and keep manual for future reference. You are expected to cooperate with our safety program and abide by its rules.

Please complete the following Employee Emergency Notification information: (Please Print)

NAME:

CURRENT MAILING ADDRESS: _____

CITY: ______ STATE: _____ ZIP: _____

DO YOU OR HAVE YOU HAD ANY PHYSICAL IMPAIRMENTS WHICH WOULD PREVENT YOU FROM PERFORMING YOUR JOB? IF YES PLEASE EXPLAIN:

IN CASE OF AN ACCIDENT PLEASE NOTIFY:

NAME:		

RELATIONSHIP: _____

DAYTIME TELEPHONE NUMBER (S): _____

AFTER 5:00 P.M. TELEPHONE NUMBER (S)_____

I have read or have had read to me the Safety Procedures Manual and I understand the Information it contains.

SIGNATURE: ______ DATE: _____

APPENDIX F

Powered Equipment Inspection Form

ID#: _____ Make: _____ Date: _____

Hour meter reading: Start: _____ End: _____

Item	Start of Shift	During Shift	End of Shift	Comments if not O.K.
Data Plate				
Lights				
Brakes-Service/Parking				
Horn				
Poweree & Werning				
Devices				
Seatbelts				
Controls/Gauges				
Hydraulic System				
Check Fluid Levels				
Tire Condition				
Mast Assembly				
Forks/Adjusting Slides				
Exhaust				
Signature of Operator				

APPENDIX G

KENNEDY GLASS

Alcohol and Drug Abuse Policy Employee Verification Form

CONSEQUENCES FOR VIOLATION OF POLICY

Violation of the corporate alcohol and drug policy may result in severe disciplinary action, including discharge, at the Contractor's sole discretion.

In addition to any disciplinary action, the Contractor may, in its sole discretion, refer the employee to a treatment and counseling program for alcohol or drug abuse. Employees referred to such a program by the Contractor must immediately cease any alcohol or drug abuse and may be required to subject themselves to periodic unannounced testing for a determined period of time, and must comply with all other conditions of the treatment and counseling program. The Contractor shall determine whether an employee referred for drug or alcohol treatment and counseling should be temporarily reassigned to another position.

EMPLOYEE CONSENT

I have carefully and thoroughly read the corporate alcohol and drug abuse policy. I agree, without reservation, to comply with that policy.

Name

Date

APPENDIX H

Report of Injury / Illness PROJECT NAME: _____ ADDRESS: NAME OF INJURED PERSON: ______ OCCUPATION: WHAT WAS EMPLOYEE DOING AT TIME OF INJURY: **DESCRIPTION OF ACCIDENT:** NATURE AND EXTENT OF INJURY: DATE OF ACCIDENT: _____ TIME OF ACCIDENT: _____ UNSAFE CONDITION OR ACT: FUTURE OCCURANCE PREVENTION: **REPORT/INVESTIGATION COMPLETED BY:**

SIGNATURE: _____

_____ DATE: _____

(*SUBMIT ORIGINIONAL COMPLETED REPORT TO CORPERATE OFFICE WITHIN TWO WORKING DAYS)

APPENDIX I

Respiratory Protection Acknowledgement

Copy given to all employees who choose to wear approved N-95 Dust Mask during work in our operation. NOTE: Voluntary Use Only

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

You should do the following:

- 5. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
- 6. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- 7. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
- 8. Keep track of your respirator so that you do not mistakenly use someone else's respirator. [63 FR 1152, Jan. 8, 1998; 63 FR 20098, April 23, 1998]

By signing below, I understand the information provided above and agree to follow all safety precautions when I voluntarily use an approved N-95 Respirator (dust mask).

Date:

Signature:

APPENDIX J

Jobsite Inspection Checklist

Inspected by:							
Comp	any/Project name:						
Number of Employees:		Copy provided to:			led to:		
1.	Site Access	ок	Not OK	NA	Corrective Action Taken		
	Clean & Level ground						
	Adequate ramps ect.						
	Stairs Adequate and clear						
	Ladders Adequate and clear						
2.	Protective Equipment (PPE)			_			
	Hard Hats accessible and worn						
	Fall Protection worn						
	Protective clothing						
	Eye and Face protection						
	Hearing Protection						
	Respirators, ventilation						
3.	Guardrails/ barricades						
	Location in needed/ required						
	Constructed properly						
	Secured adequately						
4.	Ladders						
	Secure						
	Angle/ base distance (extensions)						
	Size and type for the job						
	Usability (Not Damaged or broken)						
	Handrails and landings						
	Non-slip base attached						
5.	Fire safety						
	Extinguishers when required						
	Extinguishers charged						
	Emergency Evacuation plan						
	Exits clearly marked						