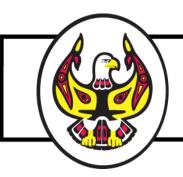


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Safety Manual



Safety Manual

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1.0 Safety and Health Policy

LIBC believes it is the right of all employees to work in an environment in which they can reasonably expect to depart from their work activities in a physical condition that is as good as when they arrived. The education of personnel in prevention and causes of occupational injury and illness is of primary importance to this belief.

Thus LIBC has established a program that integrates Safety and Health into all undertakings, such that safety and overall job performance are of equal importance in the final outcome of everyday and unique job tasks. This can only be accomplished through the efforts of all LIBC employees.

The introduction of all employees into this proactive Program begins with the initial Safety Orientation, continuing with appropriate training and active involvement with the program throughout his/her career.

By accepting mutual responsibility to conduct operations in a safe manner, all involved will contribute to the welfare of all employees of LIBC.

LIBC Chairman
Lummi Indian Business Council

Clifford Cultee, LIBC Chairman



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2.0 Responsibilities

Human Resource Director

Implement an effective Injury and Illness Prevention Program and appoint a Workplace Safety Officer to implement and direct program efforts.

Each employee will be fully responsible for implementing the provisions of this Safety Manual as it pertains to operations under their jurisdiction. The responsibilities listed below are MINIMUM, and shall in no way be construed to limit individual initiative to implement more comprehensive procedures to curb losses.

Workplace Safety Officer

The Workplace Safety Officer will conduct an aggressive Injury and Illness Prevention Program. The Workplace Safety Officer is fully responsible to the Human Resource Director for the direction and administration of the Injury and Illness Prevention Program, and will take all actions deemed necessary to produce a positive reduction in accidents and their causes. Specifically, the Workplace Safety Officer will:

- 1. Obtain the necessary training to satisfy the needs of the Program.
- 2. Obtain the information and equipment to implement a fully integrated Safety Program.
- 3. Provide technical guidance and direction to personnel and all levels of management in the implementation of the Program.
- 4. Consult with Supervisors regarding design and use of equipment, and safety standards for each work area.
- 5. Conduct weekly job site inspections to detect existing or potential accident and health hazards and recommend corrective or preventive measures where indicated.
- 6. Participate in the investigation of accidents and injuries, and cooperate in the preparation of material and evidence for LIBC.
- 7. Monitor all safety inspections and surveys.



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- 8. When prescribed safety practices are not being enforced, STOP WORK and immediately notify the Supervisor.
- Maintain his/her program and include the current practices adopted by the safety profession as most effective in preventing injuries, occupational disease, liabilities, and damage to equipment and material.
- 10 Periodically evaluate compliance of the Injury and Illness Prevention Program in work areas and submit a written report of findings to the appropriate persons.
- 11. Attend Safety Professional meetings to promote maximum understanding of the program objectives.
- 12. Maintain complete records on company accidents in accordance with an understanding of OSHA requirements and publicize information which will apprise appropriate persons of trends and may call for strong corrective measures.

Supervisor's Responsibilities

Each Supervisor will be fully responsible and accountable to the Workplace Safety Officer for compliance with the provisions of the Safety Policy within their job site. The Supervisor will ensure that:

- 1. All hazardous tasks are covered by specifically written safety rules and practices to minimize injury and property damage potential.
- 2. All personnel are briefed and fully understand safe work procedures and policies.
- 3. All employees are trained and, when necessary, retrained in the accepted way each hazardous job must be accomplished.
- 4. All employees are instructed and understand the use and need for protective equipment for specific hazardous jobs.
- 5. Necessary safety equipment for each job is available and used properly.



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- 6. All accidents are promptly reported, thoroughly investigated, and properly recorded.
- 7. Prompt, corrective action is taken wherever hazards are recognized or unsafe acts are observed.
- 8. Each Supervisor is held accountable for the preventable injuries and liabilities incurred by their employees. This could be accomplished by reviewing the Safety Manual and Training requirements as deemed necessary by management.
- 9. All equipment, materials, and work conditions are satisfactory from an accident prevention standpoint.
- 10. The Workplace Safety Officer is consulted when assistance is needed in implementing the Injury and Illness Prevention Program.
- 11. All injured persons regardless of how minor the injury receive prompt medical treatment, and submit required accident reports within twenty four hours to the Workplace Safety Officer.
- 12. Necessary action is initiated to assure compliance with safety requirements established for hazardous conditions, locations, and operations, to include notification of the appropriate person prior to the start of any hazardous operation.
- 13. Recommendations concerning correction of deficiencies noted on the jobsite(s), work procedure, employee job knowledge, or attitudes that adversely affect company's Safety Policy are initiated as soon as possible.
- 14. Frequent inspection of all tools and equipment is made to insure they are kept in a safe and serviceable condition.
- 15. Employees are not permitted to operate any mechanical or electrical equipment until properly trained.
- 16. A continuous program of on-the-job training is maintained and all potentially hazardous activities are supervised.
- 17. That all employees are physically qualified to perform their work.



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- 18. All areas prescribed as dangerous are marked with type of hazard involved.
- 19. Only authorized persons will be permitted to enter hazardous work areas.
- 20. Quarterly job site safety inspections are completed and turned into the Safety Officer.
- 21. That the employees are retrained/given guidance for unsafe actions and violations.
- 22. That a mandatory five (5) minute toolbox safety meeting is performed on a regular basis.

Employees Responsibilities

Employees are required, as a condition of employment, to exercise care in the course of their work to prevent injuries to themselves and to their fellow workers.

Each employee will:

- 1. Report all unsafe conditions and acts to their supervisors.
- 2. Be individually responsible to keep themselves, fellow employees, and equipment free from mishaps.
- 3. Keep work areas clean and orderly at all times.
- 4. Follow prescribed procedures during an emergency.
- 5. Report all accidents immediately to their supervisor.
- 6. Be certain that the employee completely understands the instruction given before starting work.
- 7. Follow instructions, the employee will ask the supervisor questions when in doubt about any phase of the operation.
- 8. The employee shall only operate equipment they are qualified to operate. When in doubt ask direction.



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- 9. Learn to lift and handle materials properly.
- 10. Do not take chances; all employees will use safety equipment as directed.
- 11. Avoid engaging in any horseplay and avoid distracting others.
- 12. Observe and comply with all safety signs and Accident Prevention regulations.
- 13. Know how and where needed medical help may be obtained.
- 14. Not damage or destroy any warning or safety device, or interfere in any way with another employee's use of them.
- 15. Report all injuries, no matter how minor, to their supervisor.

Each Employee working with hazardous jobs will:

- 1. Obey all safety rules and follow written safe work or oral instructions. If any doubt exists about the safety of doing a job, stop and get instructions from the supervisor before continuing work.
- 2. Wear required protective equipment when working in a hazardous operation area and dress safely.

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3.0 Employee Safety Training

General

The Workplace Safety Officer or Supervisor will assure all newly assigned individuals receive required training before beginning work.

On-the-job Training

On-the-job-training will be accomplished by the Supervisor. This training will include:

- Company Safety Manual.
- Safe work clothing and equipment needed for the job.
- Emergency treatment of injuries.
- How to report a fire or serious injury or accident.
- General hazards encountered in the work area and how to avoid them.
- Personal Protective Equipment (PPE).

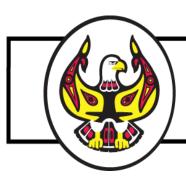
If an employee demonstrates, through accidents or continued unsafe acts, that the employee does not understand the safety requirements of their job, the employee will be retrained through personal training programs, repeat on-the-job-training, or be personally counseled by the Workplace Safety Officer.

Specialized Training

Specialized training will be required from time to time for special areas of operations and to meet specific requirements of unique tasks. This includes Personal Protective Equipment (PPE) for personnel and other special requirements that may arise at the job site.

Supplemental Training

Supplemental safety training and promotion of safety activities will be conducted by the Workplace Safety Officer to include safety films and color slide presentations in various work areas, promotional literature such as Safety Posters, Booklets, and other Media.



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New Employee Orientation

All new employees will receive safety orientation, education and training for their job assignment, within their first two weeks of employment with LIBC.

The Workplace Safety Officer or the employee's Supervisor will provide the new employee safety orientation. This effort will be documented on the Employee Safety Orientation/Training Record form.

Each employee must sign the safety orientation form upon receiving instruction from the Workplace Safety Officer or the employee's Supervisor.

The Workplace Safety Officer must also sign the form signifying that the employee was given a safety orientation.

The signed copy of the safety orientation form shall be maintained at the Human Resource Office.

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4.0 First Aid & Medical Services

LIBC supervisory or Workplace Safety Officer will coordinate First Aid and Medical Services with LIBC employees

LIBC supervisory will insure that approved first aid supplies and equipment are available on every job, and in every vehicle.

LIBC supervisors, foreman and office managers are trained and authorized to provide first aid care to an injured employee.

Should the victim be bleeding, use pressure to stop the bleeding and remember to protect yourself from bloodborne diseases. You should only give CPR if you are trained.

Names, addresses and telephone numbers of emergency care providers will be prominently displayed on the job site.

Employee medical records are maintained in strict confidence.

Injuries and illnesses must be reported immediately.



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5.0 Accident & Incident Reporting

Policy

THE ACCIDENT REPORT FORMS ARE AVAILABLE FROM HUMAN RESOURCES, WORKPLACE SAFETY OFFICER AND THE LIBC INTRANET.

In order to avoid a delay in processing your claim, the employee shall immediately report the injury to their Supervisor and to the Workplace Safety Officer. The Supervisor shall provide the employee with an injury report form and instruct the

employee to complete and return the forms to the Workplace Safety Officer. The supervisor is responsible for getting the injury report turned in within twenty-four (24) hours of the accident.

LIBC requires that all information regarding a near miss, accident/incident be reported. Upon discovery of any near miss, accident/incident, an investigation report shall be filled out. The supervisor or immediate foreman shall fill out the report form. Copies shall be distributed to Tribal First via the Workplace Safety Officer and then placed in the employee's file.

Purpose

Accident prevention is the key to eliminating possibility of injury to employees and property loss. Learning from past accidents is one of the key elements addressed in LIBC accident prevention training. This procedure addresses steps to be followed for all accidents resulting in employee injury or property damage.

Supervisor Involvement

In most cases, the Workplace Safety Officer shall conduct the investigation. In the absence of this individual, a supervisor representative shall investigate. This investigator must take the accident situation under control and immediately eliminate or control hazards to others.

Immediate Steps

- Provide first-aid for any injured person
- Eliminate or control any hazards that may exist

^{*}The accident report should be clear and concise*



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- Communicate hazards to employees to avoid possible injuries
- Document accident scene information to determine the cause
- Interview witnesses immediately

Accident Causes

Obvious accident causes are probably symptoms of a "root cause" problem. Some examples of unsafe acts and unsafe conditions, which may lead to an accident, are:

Unsafe Acts

- · Unauthorized operation of equipment
- Running/horse play
- Not following procedures
- By-passing safety devices

Unsafe Conditions

- Ergonomic hazards
- · Environmental hazards, Inclement weather conditions
- Inadequate housekeeping
- Blocked walkways
- Improper or damaged personal protective equipment
- Inadequate machine guarding

All near miss, accidents/incidents shall be reported immediately to a supervisor. A complete investigation shall take place and documentation shall be turned in by the end of the shift, unless other arrangements have been made.

Procedures for Completing an Investigation

- Document the facts
- Record who, what, when, how, witnesses names and sequence of events
- Do not record your opinion or speculation
- Do not attempt to fix blame
- Do not lead witnesses, let them tell what happened in their own words

Analysis



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Conduct a review of all accident facts. Gather photos (if needed), statements and notes. Generally a team of 2 to 3 people shall conduct this review. Check employee records of those involved. Have they been trained? Was the task they were involved in part of their assigned duties? Were there any unsafe conditions? Were there any unsafe acts?

Recommendations

As a result of the findings is there a need to make changes to:

- Employee training
- Work station design
- Policies or procedures



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7.0 Emergency Evacuation

Purpose

To establish a method, whereby, in the event of an emergency evacuation employees shall report to a "pre-designated location".

Applicability

All employees shall follow the Emergency Evacuation Procedures.

Format

- 1. In the event of an emergency requiring evacuation, all employees will report to a "pre-designated location", per the facility evacuation map instructions.
- 2. All employees shall go to the pre-designated location and report to their supervisor to be accounted for.

Responsibility

- 1. On-site supervisory personnel are directly responsible to insure that evacuations are carried out in accordance with the facility evacuation map instructions.
- 2. Employees will not return to their work location until the "all clear" is given, per the facility evacuation instruction.
- 3. All employees shall know and understand the evacuation procedures.

Supervisors are responsible for the evacuation of all affected employees when a previously unknown hazard is discovered or observed. Employees are not to return to the area until the hazard is removed or corrected.



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7.0 Safety Committee

The purpose of this committee is to assure that the lines of communication between employer and employee remain open at all times. This committee will meet monthly to discuss safety concerns that are brought up by employees. The meetings will be documented and the attendees will sign in.

Management will make a conscious effort to deal with the issues within a reasonable time frame. More immediate issues or concerns will be dealt with as soon as possible. These meetings will also reinforce the employee's responsibility for following the safety rules and regulations. The following is a summary of some topics to be discussed by the safety committee meeting:

- Results of monthly physical and mechanical hazards survey
- Evaluation of the facilities equipment, processes and the person responsible for the area of concern
- Review employee safety suggestions brought to the Safety Committee meeting via employee representatives

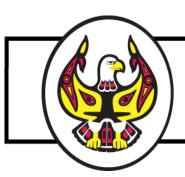
8.0 Record Keeping

LIBC will maintain all safety reports, employee health records and statistics at the Human Resources office. Some of these records are maintained and protected under the privacy act. Examples of records that will be maintained are:

OSHA Equivalent 300 Log
OSHA Equivalent 101 Report
First Aid Log
Safety Committee Meeting Records

Incident/Accident Investigations Equipment Inspections Reports Safety Inspection Reports Safety Training Records

Records created or augmented at the job site will be maintained by the job supervisor or a designated representative. All job site records will be returned to the Project Coordinator for review and final documentation and filing if required, when the project is demobilized.



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9.0 Access to Medical Records

Purpose

The purpose of this section is to provide employees and their designated representatives a right of access to relevant exposure and medical records in order to fulfill responsibilities in a recommendation of the Occupational Safety and Health Act. Access by employees and their representatives is necessary to yield both direct and indirect improvements in the detection, treatment and prevention of occupational disease.

Scope

This section applies to all employee exposure and medical records, and analyses thereof, made or maintained in any manner, including an in-house or contractual basis. LIBC shall assure that the preservation and access requirements of this section are complied with regardless of the manner in which records are made or maintained.

Notification

Upon initial employment employees will be briefed and at least annually thereafter, informed via a bulletin board posting of the following:

- The existence, location and availability of employee records for exposure to toxic substances or harmful physical agents.
- The person responsible for maintaining and providing access to the records. Contact Human Resources to initiate this request.
- The employee right of access to those records.
- The entire section pertaining to the Access to Employee Exposure and Medical Records is available for employee review by contacting the Human Resource Director.

Record Keeping

• The Human Resources Director or the Benefits Coordinator is responsible for maintaining and providing access to employees' medical records. These records are kept separately from other employee records.



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- Employee exposure records shall be maintained for the duration of employment and for 30 years thereafter and should include the following:
 - Environmental (workplace) monitoring including personal, area, grab, swipe (wipe over a designated area), etc. type samples.
 - Biological monitoring—level of chemical in the blood, urine, hair, fingernails, etc.
 - Material safety data sheets or a chemical inventory or any other record which reveals where and when used and then identify (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.

Access

Each employee or designated representative has the right to request access to their records. The company shall assure that access is provided in a reasonable time, place, and manner.

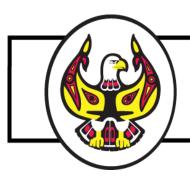
The employee may access their records by making a request to the Human Resources Director or Benefits Coordinator. LIBC will release an employee's medical records only if the employee has given specific, written consent.

If LIBC cannot reasonably provide access to the record within fifteen (15) working days, LIBC shall within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available.

Employees have the right of access and can copy all records pertaining to their own medical employment questionnaires/histories, drug test results, first aid records, medical evaluations or opinions, treatment descriptions, or any other exposure or medical related records.

Records or copies will be provided at no cost to the employee.

Whenever a record has been previously provided without cost to an employee or designated representative, LIBC may charge reasonable, non-discriminatory administrative costs (i.e., search and copying expenses but not including overhead expenses) for a request by the employee or designated representative for additional copies of the record.



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10.0 Confined Space Entry

Purpose

This procedure establishes a written program of policies and procedures required to insure employee safety and health when working in a confined space.

Scope

The requirements of this procedure apply to all employees.

General

Confined spaces represent a unique and particularly serious type of hazard. All personnel involved in confined space entry must be trained and equipped to deal with conditions they may or will encounter.

LIBC will provide training for all personnel whose duties and responsibilities require them to work in or around confined spaces. This training will be given to all new employees as a part of their initial safety and health orientation. Refresher training will be given annually.

LIBC will provide all equipment required to insure the safety of those entering confined spaces.

Definitions

- 1. <u>Confined Space</u> A confined space is any area which has (1) adequate size and configuration for entry, (2) has limited means of entry or exit (including excavations) and (3) was not designed to be occupied by an employee.
- 2. <u>Permit Required Confined Space</u> A confined space that contains, or has the potential to contain, a hazard. Toxic, flammable or asphyxiating atmospheric conditions are the hazard most commonly encountered by the company in confined spaces. Other recognized serious hazards to health and safety, however, could be encountered.
- 3. <u>Entrant</u> Anyone entering a permit required confined space must be authorized prior to entry. This authority will only be granted to those who demonstrate an understanding of the hazards and their consequences which



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they may encounter, can recognize signs and symptoms of the hazards, and are knowledgeable in all equipment and procedures needed to insure health and safety.

- 4. <u>Attendant</u> A confined space attendant, often called a "manwatch" or "holewatch", must know the hazards and their effects which may be encountered. He/she must also know the number and identification of authorized entrants at all times. He/she must constantly monitor conditions around them, prevent unauthorized entry, order exits, and summon rescuers as required.
- 5. <u>Permit System</u> The written procedure for preparing and issuing the permits authorizing work to be done.
- 6. <u>Entry Permit</u> A document which authorizes and controls work in a confined space where hazards or the potential for hazards exists.

Responsibilities and Duties:

1. Entrant

- a) Understand the hazards, the consequences of exposure and the signs and symptoms of exposure you may encounter.
- b) Know, understand and meet all permit requirements. Be certain that the task you are assigned to do is allowed by the entry permit. Should other permits be required notify your supervisor.
- c) Check in with attendant when entering or exiting.
- d) Alert attendant and other entrants to warning signs, hazards or conditions prohibited by permit. Be aware of changing conditions.
- e) Utilize the safety equipment provided at all times.
- f) Exit as quickly as possible when ordered or alerted.

2. Attendant

- a) Understand the hazards, the consequences of exposure and the signs and symptoms of exposure entrants may encounter.
- b) Know, understand and meet all permit requirements.
- c) Maintain a continuously accurate count of authorized entrants in the confined space and their identity.



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- d) Monitor activities inside and outside the confined space.
- e) Remain outside the confined space until properly relieved.
- f) Prevent or report to the entry supervisor, entry by any unauthorized person.
- g) Maintain communication with authorized entrants.
- h) Alert and evacuate entrants should (1) any condition change outside the confined space, (2) behavior of entrants indicates hazard exposure, (3) a condition prohibited by permit occurs or (4) you cannot effectively or safely perform all the duties assigned you.
- i) Summon rescue and emergency personnel if required.
- j) Perform no duties which will interfere with your primary function of monitoring and protecting the entrants.

Permit System and Entry permit

Training in the specific requirements of the system will be given prior to beginning work. Permits will be prepared and issued after analyzing the hazards and determining the steps required to eliminate them. Permit preparation is the responsibility of the job supervisor or his designated representative. The entry permit should be posted at the point of entry. Trenches and excavations over four (4) feet in depth are considered confined spaces and require the appropriate permits.



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11.0 Fall Protection

Purpose

To establish methods and procedures for all employees, while working above ground level, and to prevent exposure to elevated fall hazards.

Scope

This policy will be the MINIMUM requirements for LIBC employees.

This policy applies to fall hazards such as, but not limited to,

- All elevations greater than six (6) feet.
- Elevator openings.
- Stairway openings.
- Vent or mechanical openings.
- Steel skeleton structure.
- Open-sided floors or platforms.
- Yellow tagged scaffolds
- Ladders above six (6) feet.
- Pipe racks.
- Manlifts and manbaskets.
- Scissor lifts.
- Some confined space entries.

Definitions

<u>Lanyard</u>: a flexible line of webbing, rope or cable used to secure a harness to a lifeline or an anchorage point usually 2, 4, or 6 feet long.

<u>Anchorage</u>: a secure point of attachment for lifelines, lanyards or deceleration devices which is capable of withstanding or supporting four times the intended load.

<u>Full Body Harness</u>: a configuration of connected straps to distribute a fall arresting force over at least the thighs, shoulders and pelvis with provisions for attaching a lanyard, lifeline or deceleration device.

Fall Protection



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- 1. Safety harnesses and lifelines must be used when working six (6) feet or more above the ground or continuous floor level when other safeguards, such as nets, planking, or scaffolding cannot be used. Be sure safety lines are independent of other rigging. Use the shortest lanyard possible to limit the potential fall distance.
- 2. Safety harnesses and lanyard lifelines are used only for employee protection. Any lifeline, safety harness or lanyard actually subjected to any loading (except from a static load test) will be immediately removed from service.
- 3. Lifelines are secured above the point of operation to an anchorage or structural member capable of supporting a minimum of 5,000 pounds.
- 4. Safety harnesses, lifelines and lanyards must meet appropriate specification standards as <u>referenced</u> by OSHA/NIOSH.
- 5. All lanyards shall contain double locking snap hooks with shock absorbers that are inseparable from harness.
- 6. Airplane cable type lanyards are not to be used.
- 7. Where welding operations or chemicals could damage a nylon lanyard, a "Kevlar" type protection snap-on cover must be provided to protect the lanyard.

Inspection of Safety Harness

Before issuing, all safety harnesses must be inspected. Each employee must visually inspect his harness and lanyard prior to each use. In the event that any employee feels at any time that the harness he is using in not acceptable, he must immediately contact his/her supervisor. Safety lanyards are examined for frayed and broken strands, abrasions (rot and burns), and general appearance.

Once a month all lanyards and safety harnesses shall be inspected by the Workplace Safety Officer.

Each employee will be issued their own safety harness.



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12.0 Hazard Communication

LIBC has developed a Hazard Communication Program to enhance our employees' health and safety.

We intend to provide information about chemical hazard and other hazardous substances, and the control of hazards via our comprehensive Hazard Communication Program which includes container labeling, Material Safety Data Sheets (MSDS) and training.

The following program outlines how we will accomplish these objectives:

Container Labeling

- All containers will be clearly labeled as to the contents.
- Appropriate hazard warnings are noted.
- The name and address of the manufacturer shall be listed.

To insure that all employees are aware of the hazards of materials used in their work areas, it is our policy to label all secondary containers as to the contents and appropriate hazards warnings.

Material Safety Data Sheets (MSDS) (For company supplied hazardous materials)

The jobsite supervisors or their designated safety representative will be responsible for:

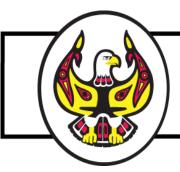
- Obtaining and maintaining the MSDS for their locations.
- Review incoming MSDS for new and significant health and safety information.
- Providing a MSDS for company supplied hazardous materials to client and subcontractor.

LIBC will provide the site supervisor or their designated safety representative with an MSDS for any hazardous material that is not on the current hazardous material inventory. No hazardous material may be released for use until approved by the Workplace Safety Officer.

Material Safety Data Sheets (MSDS) (For customer supplied hazardous materials)

The site supervisor is responsible for obtaining from the client; their procedure on MSDS availability for employees and subcontractors of the company.

Instructions will be provided to the employees and subcontractors on the client MSDS availability.



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Employee Information and Training

Employees are to attend a health and safety orientation set up by the Workplace Safety Officer or designated representative, prior to starting work, for information and training on the following:

- An overview of the requirements contained in the Hazard Communication Program.
- Inform employees on customer's MSDS availability procedures.
- Location and availability of the written Hazard Communication Program.
- Methods and observations techniques used to determine the presence or release of a hazardous substance in the work area.
- How to lesson or prevent exposure to these hazardous substances through the use of engineering controls, work practices, and/or the use of personal protective equipment.
- Emergency and first aid procedures to follow if employees are exposed to hazardous substance(s).
- How to read labels and review MSDS to obtain appropriate hazard information.
- To inform employees on physical and health effects and general operations where hazardous substances are present. This training matter will be organized by category of hazards.

When a new hazardous substance is introduced, the above items will reviewed as they relate to the new material in a safety meeting.

Hazard Specific Training

As a regular agenda item of the standing safety meeting, (tailgate, all hands) the following specific topics will be reviewed:

- Physical and health effects of hazardous substances to be encountered.
- Operations where the hazardous substances are likely to be encountered.
- Methods and observations techniques used to determine the presence or release of a hazardous substance likely to be encountered.
- How to lessen or prevent exposure to the hazardous substances likely to be encountered through usage of engineering controls, work practices, and/or the use of personal protective equipment (PPE).



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• Emergency and first aid procedures to follow if employees are exposed to hazardous substances.

List of Hazardous Substances

Refer to MSDS binder kept by the onsite supervisor or safety representative.

Hazardous Non-Routine Tasks

Periodically, employees are required to perform hazardous non-routine tasks. Prior to starting work on such projects, the site supervisor and/or their safety representative will obtain, from the customer, information on:

- Specific hazards likely to be encountered.
- Protective safety measures which must be utilized.
- Measures the customer has taken and the company may take to lessen the hazards including ventilation, respirators, presence of another employee and emergency procedures.
- The site supervisor and/or their safety representative will meet with the affected employees prior to starting work on the project to review such information as provided by the client.
- The client standard job procedures and/or work orders may provide the required information.

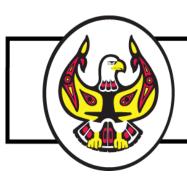
Informing Subcontractors (Multi-employee jobsite)

To insure that the subcontractors work safely at our jobsite, it is the responsibility of the site supervisor and/or their safety representative to provide the subcontractor the following information:

- Hazardous substances supplied by the company to which they may be exposed while on the jobsite.
- Precautions the employees may take to lessen the possibility of exposure by usage of appropriate protective measures of hazardous substances supplied by the company.
- The facility owner (customer) procedures on MSDS availability, precautionary measures to be taken during normal operations, foreseeable emergencies and methods of labeling hazardous material.

THIS PLAN WILL BE MONITORED BY THE SITE SUPERVISOR OR THEIR DESIGNATED SAFETY REPRESENTATIVE TO ENSURE THAT THE POLICIES ARE CARRIED OUT AND THAT THE PLAN IS EFFECTIVE.

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13.0 Hearing Conservation

General

Work site noise can rise to unhealthy levels at times, no matter how you try to keep it down. When noise cannot be reduced to safe levels, employees must wear ear protection devices to protect their hearing.

Not all sounds have the same effect on hearing. The three changing factors in noise are; intensity, pitch and length of exposure.

Intensity means loudness of sound, and is measured in decibels (dB).

Pitch refers to frequency of sound waves. A high-frequency (high-pitched) whistle is generally more harmful than the low frequency sound (low-pitched).

Length of exposure refers to the time one is subjected to a noise. Continual exposure to certain noises can be more harmful than occasional bursts of offensive sound.

Since work sites are noisy by nature, and engineering controls are not feasible, hearing protection devices (ear plugs) must be worn when employees are required to work in a noise hazard environment.

Hearing tests (audiograms) are often used to complete the employee's health records when the employee is assigned to work in a high noise environment.

Hearing Test and Procedures

As part of LIBC's continuing safety programs and policies, the following information is provided as a guideline to ensure that employees are tested annually <u>when</u> job site noise levels are at 85 decibels or above.

We will establish and maintain an audiometric testing program which will be available to all continuously employed personnel whose exposure is equal or exceeds an eight (8) hour time weighted average of 85 decibels.

This testing will be provided to our employees at no cost.



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Audiometric testing will be performed by a licensed or certified audiologist, otolaryngologist, or other physician, or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation.

Within six (6) months of our employee's first exposure at or above the action level, we will establish a valid baseline audiogram against which subsequent audiograms can be compared. After the baseline audiogram is established, annual audiometric testing will be conducted by a licensed audiologist.

If the audiogram indicates abnormal threshold values, the employee will be notified of this fact in writing within 21 days of the determination.

Those employees who are exposed to 85 decibels or above for the eight (8) hour time weighted average will be fitted for hearing protectors.

Employees who are required to wear the hearing protectors will be given the proper training in the use and care of all hearing protectors provided by the company.

Employees who do not follow this policy are subject to disciplinary action or termination of employment.

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14.0 Lockout/Tagout

Purpose

The purpose of the lockout/tagout procedure is to prevent personal injury and property damage due to accidental start up of machinery and equipment that is under repair or upon which maintenance is being performed. This procedure applies to energy sources that are mechanical, air, electrical, hydraulic, thermal, and/or springloaded.

Applicability

All employees shall use this procedure as a MINIMUM requirement.

Responsibility

LIBC site supervisor/safety representative is responsible for following the lockout/tagout procedures. Each supervisor is responsible for checking that circuits are de-energized before any work is started. Only the person signing and placing a lockout/tagout may remove the lockout/tagout when work is complete. Each employee is responsible for putting their own lock on the system.

General Guidelines

Identify all sources of hazardous energy, movement, or toxic substances. Also locate all isolation points and disconnects which deactivate the equipment or system. Physically isolate, disconnect, or eliminate all hazards by lockout/tagout of circuit breakers, motor control switches, removal of fuses, installation of blinds, closing and locking of valves, etc.

Immobilize and lockout all isolation points and disconnects. NOTE: Locks shall not be common keyed type. Tag all isolation points and identify persons installing the tag.

Reactivate the system only through these guideline procedures which prevents injury or equipment damage when performed properly. This includes removal of all personnel and equipment from the danger zone until the equipment is in operating condition.

Standard circuit switches, push buttons, or toggle switches are not to be used for lockout/tagout purposes where employees may be injured by accidental operation.



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Always check all locks and tags at the start of each shift. Never assume the equipment or system is locked out before starting work.

Where the work requires entrance into a confined space, the provisions for Confined Area Entry, shall be followed in addition to these instructions.

Tagging Procedures

The tag is signed by both the employee and his/her supervisor. This includes their names and the date.

Always attach a signed tag with a lock.

Place tags directly on the lock and in a place as visible as possible.

Do not use lockout/tagout tags for other purposes.

Use lockout/tagout procedures even where employees are not exposed to hazards from the accidental operation of the system or piece of equipment.

Complex Lockout/Tagout Procedures

This procedure deals with a work assignment that could include many different energy sources to the same piece of equipment or machine, more than one crew or a work assignment that extends over several days and/or shifts.

All authorized and affected employees will be instructed as to the type and magnitude of energy that the machine or piece of equipment utilized before the lockout/tagout procedure is started or before the employee starts work on the piece of equipment or machine.

Selected LIBC employees will be trained in the single lockout/tagout procedure as well as this complex or group procedure. The employees will be retrained as needed or at least annually.

In a complex or group lockout/tagout procedure, each authorized employee will be assured of his/her right to verify individually that the hazardous energy has been isolated and/or de-energized.



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In a complex or group lockout/tagout procedure, a Supervisor (principal authorized employee) will accompany the operations person while he/she is isolating, locking out and de-energizing the piece of equipment or machine to be worked on. This is to verify a "ZERO MECHANICAL STATE." The supervisor will place his/her lock and tag on the master lock box after the operations person has placed their key inside the master lock box and secured the box with a lock and multiple lock device. The principal authorized employee will keep his/her lock and tag in place as long as they are working on the equipment or machinery.

If there is more than one shift working on this equipment or machine, the principal authorized employee from the shift coming on needs to verify isolation of the machine or equipment before they start work. They will also place their own lock and tag on the master lock box. Their lock and tag will remain in place as long as they are performing work on that equipment or machinery.

Before starting work on the machine or piece of equipment, each authorized employee shall verify that isolation and de-energize of the machine or piece of equipment has been accomplished.

Before starting work on the machine or piece of equipment, each authorized employee shall place his/her personal lock and tag on the master lock box. Their lock and tag will remain in place as long; as they are performing work on that equipment or machinery.

Group Lockout/Tagout Procedures

In a group lockout/tagout procedure, the required steps can be tailored to a specific industrial operation and may be unique in the manner that employee protection from the release of hazardous energy is achieved. Irrespective of the situation, the requirements of this standard specify that each employee be in control of the hazardous energy during his/her period of exposure.

Before the machine or equipment is shut down, each LIBC employee who is to be involved during the servicing/maintenance operation shall be made aware by the supervisor of the type, magnitude, and hazards related to the energy to be controlled and of the method or means to control the energy. In the case that machine or equipment is already shutdown, the authorized employees of LIBC shall be made aware of these elements before beginning his/her work.



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A single lock and tag upon each energy isolation device, together with the use of a job or master lock box for retention of the keys and to which each employee of LIBC affixes his/her personal lock and tag, is required.

If more than one shift is to work on the equipment or machine, the crew coming on needs to verify isolation of the energy source or sources. They shall also attach their own locks and tags to the job or master lock box before starting work.

Once an authorized employee's work is completed, they will remove their own lock and tab from the job or master lock box.

Primary responsibility will be vested to a principal authorized employee for a set number of employees working under the protection of a group lockout or tagout device (such as an operations lock). When more than one crew, craft, department, etc., is involved, assignment of the overall job associated lockout or tagout control responsibility shall be given to a principal authorized employee, who is designated to coordinate affected work forces and ensure continuity of protection.

Equipment Turnover and Startup

At the time the equipment is ready to be turned over to the customer, the following requirements must be initiated in addition to the above.

Where established, the client lockout/tagout requirements are to be integrated into our procedures.

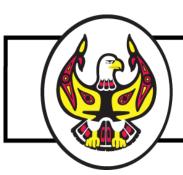
The client's personnel and other contractors involved must be included in the lockout/tagout system of locks and tags, policies and procedures.

There must be separate, identifiable locks and tags for client lockout/tagout as well as for each contractor.

Definitions

<u>Affected Employee</u>: A person whose job it is to work around or operate a piece of equipment or machinery that is under lockout/tagout. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance work on the locked/tagged machine or piece of equipment.

<u>Authorized Employee</u>: A person who locks out or tags out a machine or piece of equipment in order to perform servicing or maintenance on that machine or piece of equipment.



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<u>Company Lock Box</u>: Is the lockable box controlled by the job supervisor that contains the duplicate keys for the employee's (authorized employee or principal authorized employee) personalized locks.

<u>Job/Master Lock Box</u>: Is a secondary lock box or lock boxes to which each authorized or principal authorized employee attaches his/her personal lock or tag. This system is used during a complex or group lockout procedure. Personal locks and tags shall remain on this lock box during the employee's shift, while he/she is working on the equipment or machine.

<u>Lockout</u>: The placement of a lockout device on an energy isolation device in accordance with an established procedure, ensuring that the energy isolation device and the equipment being controlled cannot be operated until the lockout device is removed.

<u>Principal Authorized Employee</u>: Is an authorized employee who oversees or leads (supervisor) a group of servicing or maintenance workers, authorized employees (crew or electricians.)



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15.0 Personal Protective Equipment

Policy

All personal protective equipment must be properly designed and sufficiently well constructed to provide the protection for which it is intended. It must be maintained in a sanitary and reliable condition.

Personal protective equipment for eyes, face, ears, head, extremities, respiratory system shall be provided by the company. All PPE shall be maintained in a sanitary and reliable condition. They shall be used wherever it is necessary by reason of hazards of processes or environment, chemical hazards or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

Hard Hats

Hard hats are required to be worn at all times while at the job site. All employees where a hazard exists that could cause injury to workers' heads must use head protection. These hazards are impact and penetration from falling and flying objects and from limited electric shock and burn.

Care and use

Always check hard hats before each use following these guidelines:

Suspension: if frayed or cracked, advise the foreman so that a replacement suspension can be supplied

Shell: if cracked, cut or dented, advise the foreman so that a replacement hard hat can be supplied

Painting, cutting or otherwise modifying hard hats voids the ANSI approval and is <u>not</u> permitted. Safety hard hats need to meet the requirements of the ANSI standard for industrial head protection.

Eye and Face Protection

The company shall provide protective eye and face equipment, where there is a reasonable probability of injury that can be prevented by such equipment. In such cases, management shall make conveniently available the type of protective equipment suitable for the work being performed, and the employee shall use such equipment. No unprotected person shall knowingly be subjected to a hazardous environmental condition. Suitable eye and face protection shall be provided where



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machines or operations present the hazard of flying objects, liquids, welding or a combination of these hazards.

Protective equipment shall meet the following minimum requirements:

- they shall provide adequate protection against the particular hazards for which they are designed
- they shall be reasonably comfortable when worn under the designated conditions
- they shall fit snugly and shall not unduly interfere with the movements of the wearer
- they shall be durable
- they shall be capable of being disinfected
- they shall be easily cleanable
- when limitations or precautions are indicated by the manufacturer, they shall be transmitted to the user and care taken to see that such limitations and precautions are strictly observed

Protecting our eyes and face must continue to be one of our primary concerns. We can prevent most eye and face injuries by following these steps:

- wear safety glasses with side shields when required and whenever the situation poses a safety hazard to your eyes
- during dark or hazy days and at night, clear safety glasses with side shields shall be worn
- wear a face shield when grinding or performing any other task that involves flying particles
- wear a face shield when you watch or are near a grinding operation
- always use a guard on your grinder
- do not start a grinding operation until people in the immediate area are wearing safety glasses
- always check the condition of goggle or mask lenses to ensure they are in place and in the proper condition
- erect flash screens around welding and grinding jobs
- remember to close your eyes when removing face shields, goggles or hoods and brush off your eyebrows while you eyes are closed to remove any remaining filings or dust particles

Safety eye wear shall meet the requirements of the ANSI standard for industrial eye protection and site specific requirements.



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16.0 Forklift Training

Policy

This policy is to provide guidelines in the safe operations of Fork Trucks. The procedures do not apply to cranes and carry deck equipment, which can be found in the section titled Aerial Personnel Lifts.

General Safety Procedures

Only authorized and trained personnel will operate fork trucks.

All fork trucks will be equipped with a headache rack, fire extinguisher, rotating beacon, back-up alarm and seat belts. Seat belts will be worn at all times by the Operator.

The operator will perform daily pre- and post-trip inspections. Any safety defects (such as hydraulic fluid leaks; defective brakes, steering, lights, or horn; and/or missing fire extinguisher, lights seat belt, or back-up alarm) will be taken in for immediate repair or have the fork truck taken "Out of Service".

Loads will be tilted back and carried no more than 6 inches from the ground. Loads that restrict the operator's vision will be transported backwards.

Operator will sound horn and use extreme caution when meeting pedestrians, and approaching blind corners.

Passengers may not ride on any portion of a fork truck. If fork trucks are used as a man lift, an appropriate man lift platform (cage with standard rails and toe boards) will be used.

Lift capacity will be marked don all fork trucks. Operator will assure load does not exceed rated weight limits.

When unattended, for trucks will be turned off, forks lowered to the ground and parking brake applied. Wheels shall be blocked if the truck is parked on an incline.

All fork trucks will be equipped with a multi-purpose dry chemical fire extinguisher (minimum rating 2A: 10B: C)



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Operators will report all accidents, regardless of fault and severity, to Management.

Batteries

Battery charging installations shall be located in areas designated for that purpose.

Facilities shall be provided for flushing and neutralizing spilled electrolyte, for fire protection, for protecting charging apparatus from damage by trucks, and for adequate ventilation for dispersal of fumes from gassing batteries.

Care shall be taken to assure that vent caps are functioning. The battery (or compartment) cover(s) shall be open when charging to dissipate heat.

Precautions shall be taken to prevent open flames, sparks, or electric arcs in battery charging areas.

Trucks & Railcars

The flooring of trucks, trailers and railroad cars shall be checked for breaks and weakness before they are driven onto.

The brakes of highway trucks shall be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks.

Wheel stops or other recognized positive protection shall be provided to prevent railroad cars from moving during loading or unloading operations.

Fixed jacks may be necessary to support a semi-trailer and prevent upending during the loading or unloading when the trailer is not coupled to a tractor.

Inspections

A check of the following items (as applicable) is to be conducted by the operator prior to use each shift. A documented check will be performed weekly and sent to the Shop:

- Lights
- Horn
- Brakes
- Leaks



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- Warning beacon
- Backup warning alarm
- Fire extinguisher

If any deficiencies are noted, the unit is to be repaired or placed "Out of Service" until the problem has been corrected. Additionally, it is the operator's responsibility to notify the immediate supervisor and fill out a maintenance work order.

Traveling

All traffic regulations shall be observed, including authorized speed limits. A safe distance shall be maintained from the truck ahead, and the truck shall be kept under control at all times. Stunt driving and horseplay shall not be permitted.

Other trucks traveling in the same direction at intersections, blind spots, or other dangerous locations shall not be passed.

Railroad tracks shall be crossed diagonally wherever possible.

The driver shall look in the direction of, and keep a clear view of, the path of travel.

Grades shall be ascended or descended slowly when ascending or descending grades in excess of 10 percent, loaded trucks shall be driven with the load upgrade. On all grades the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.

Dock board or bridge plates shall be properly secured before they are driven over. Dock board or bridge plates shall be driven over carefully and slowly and the rated capacity never exceeded.

Loading

Only stable or safely arranged loads shall be handled. Caution shall be exercised when handling off-center loads, which cannot be centered.

Only loads within the rated capacity of the track shall be handled.

The long or high (including multiple-tiered) loads which may affect capacity shall be adjusted.



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Trucks equipped with attachments shall be operated as partially loaded trucks when not handling a load.

A load engaging means shall be placed under the load as far as possible; the mast shall be carefully tilted backward to stabilize the load.

Extreme care shall be used when tilting the load forward or backward, particularly when working with high tiers/rows. Tilting forward with load engaging means elevated shall be prohibited except to pick up a load. An elevated load shall not be tilted forward except when the load is in a deposit position over a rack or stack. When stacking, only enough backward tilt to stabilize the load shall be used.

Fueling

Fuel tanks shall not be filled while the engine is running. Spillage shall be avoided. Spillage or oil or fuel shall be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.

No truck shall be operated with a leak in the fuel system until the leak has been corrected.

Open flames shall not be used for checking electrolyte level in storage batteries or gasoline level in fuel tanks.

Responsibilities of the Operator

Trucks shall not be driven up to anyone standing in front of a bench or other fixed object.

No person shall be allowed to stand or pass under the elevated portion of any truck, whether loaded or empty.

Arms or legs shall not be placed between the uprights of the mast or outside the running lines of the truck.

A safe distance shall be maintained from the edge or ramps or platforms while on any elevated dock, or platform or freight car. Trucks shall not be used for opening or closing freight doors.

There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler systems, etc.



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A load backrest extension shall be sued whenever necessary to minimize the possibility of the load or part of it from falling rearward.

Trucks shall not be parked so as to block fire aisles, access to stairways, or fire equipment.

Responsibility for Maintenance

Industrial trucks shall not be altered from when originally received from the manufacturer, nor shall they be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts. Additional counterweighting of fork trucks shall not be done unless approved by the truck manufacturer.

Industrial trucks shall be examined before being placed in service, and shall not be placed in service if the examination shows any condition adversely affecting the safety of the vehicle. Such examination shall be made a least daily. If they are used on a round-the-clock basis, they shall be examined prior to use each shift. Defects when found shall be immediately reported and corrected.

When the temperature of any part of any truck is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the vehicle shall be removed from service and not returned to service until the cause for such overheating has been eliminated.

Industrial trucks shall be kept in a clean condition. Non-combustible agents should be used for cleaning trucks.

Training

All training and evaluation must be completed before an operator is permitted to use a forklift without continual and close supervision.

Trainees may operate a powered industrial truck only under the direct supervision of persons who have the knowledge, training, and experience to train operators and evaluate their competence, and where such operation does not endanger the trainee or other employees.

Training consists of a combination of formal instruction, practical training (demonstrations performed by the trainer and practical, hands-on exercises



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performed by the trainee), and evaluation of the operator's performance in the workplace.

Powered industrial truck operators shall receive initial training in the following (minimum) topics:

- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate.
- Differences between the fork truck and the automobile
- Truck controls and instrumentation: where they are located, what they do, and how they work.
- Engine or motor operation.
- Steering and maneuvering.
- Visibility (including restrictions due to loading).
- Fork and attachment adaptation, operation, and use limitations.
- Vehicle capacity.
- Vehicle stability.
- Any vehicle inspection and maintenance that the operator will be required to perform.
- Refueling and/or charging and recharging of batteries.
- Operating limitations.
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.
- Surface conditions where the vehicle will be operated.
- Narrow aisles and other restricted places where the vehicle will be operated.
- Hazardous (classified) locations where the vehicle will be operated.
- Ramps and other sloped surfaces that could affect the vehicle's stability.
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust.
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

Refresher Training and Evaluation

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



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- The operator has been observed to operate the vehicle in an unsafe manner.
- The operator has been involved in an accident or near-miss incident.
- The operator has received an evaluation that reveals that the operator is not operating the truck safely.
- The operator is assigned to drive a different type of truck.
- A condition in the workplace changes in a manner that could affect safe operation of the truck.
- Once every 3 years an evaluation will be conducted of each powered industrial truck operator's performance.

Revision B, 2/11/2012