


<i>HEALTH AND SAFETY MANUAL</i>		
Title: General Health and Safety Programs		
Approved by: Greg Savoy	Rev. Date: 01/01/08	Rev. 1/1/08

1 Purpose/Scope:

This program outlines minimum safety programs, procedures or processes that must be integrated into the overall safety program of each location. The requirements contained within may be customized as deemed appropriate, but the minimum requirements must be incorporated. These basic safety program components may overlap with regulatory requirements. Wherever this occurs, location management must ensure that they are compliant with the applicable regulation.

This program is applicable to all employees .

2 Definitions/Responsibilities:

2.1 Definitions:

2.1.1 OSHA Recordable Injury and Illness:

All work-related deaths and illnesses and those work-related injuries that result in: Loss of consciousness, restriction of work or motion, transfer to another job, or require medical treatment beyond first aid.

2.1.2 OSHA Recordable with days away from work cases:

Recordable injuries or illnesses that involve days away from work beyond the day the injury took place or the illness is diagnosed.

2.1.3 The Company Preventable Motor Vehicle Incident:

A motor vehicle incident, in a vehicle used for company business, is classified preventable when the circumstances related to the incident are consistent with the principles of preventability (see Exhibit G-1.1).

2.2 Accountabilities:

2.2.1 The Company's Line Operational Management is responsible for providing a safe workplace and Health and Safety programs, procedures and Processes that reflect the Company's Core Values and the Company's Health and Safety Policy Statement.

- The Health and Safety Department is directed by and supports the Company's Management by developing Health and Safety programs, procedures and processes for their approval, conduct audits and

inspections to measure the level of execution and by providing administrative oversight for the Health and Safety Management System.

- ❑ These basic program components will promote The Company's position and minimum expectations for health and safety performance.
- ❑ Additional minimum Health and Safety requirements shall be communicated via The Company's comprehensive Health and Safety program components.

2.2.2 Location and office management is ultimately responsible for implementing effective and compliant Health and Safety programs, procedures and processes.

- ❑ Other groups or individuals will be empowered to undertake specific health and safety responsibilities relative to administrative and supervisory efforts (e.g. supervision, task teams, etc.) in an effort to develop a safety minded and knowledgeable work force.
- ❑ Management, with Safety Department support, must review the safety performance, programs, procedures, initiatives, etc., within their respective organizations, on an annual basis to ensure Health and Safety requirements do not become outdated or otherwise ineffective.

2.2.3 General Health and Safety accountabilities for Employees, Executives, Management/Supervision, and Health and Safety Professionals are as follows:

- ❑ Employees:
 - ✓ Employees have the responsibility and authority to shut down any job or operation that, in their opinion, is unsafe (i.e. Stop Work Authority).
 - ✓ Notification of the unsafe situation must be communicated to Company management immediately.
 - ✓ As a condition of employment, all employees have the responsibility to work safely and exhibit safe work behavior.
 - ✓ It is not expected, nor a condition of employment, that an employee endanger his or her life or compromise their safety and well-being to perform job duties.
 - ✓ Working safely and exhibiting safe work behavior includes the following:
 - Proper use of all equipment (including safety equipment and devices) as well as being familiar with and following safe work practices and procedures.
 - Question any practice, procedure or decision that could adversely impact the health or safety of people, property or the environment.
 - Seek guidance (supervisors, safety reps, experienced co-workers, etc.) when unsure about correct work procedure, method, practice or condition.
 - Report every incident as well as any unsafe act or condition in a timely manner.

➤ Participate in health and safety-related activities.

☐ Executives:

- ✓ Provide strategic direction and establish the Company's expectations for Health and Safety performance.
- ✓ Accountable for continual Health and Safety performance improvement.
- ✓ Review and sponsor key strategic initiatives.
- ✓ Ensure adequate resources are deployed to achieve objectives.
- ✓ Own the Health and Safety Management System process.

☐ Management/Supervision:

- ✓ Exhibit and encourage safe work behavior – lead by example.
- ✓ Establish and maintain effective health and safety processes to ensure a safe and healthy workplace.
- ✓ Assure compliance with all applicable rules, regulations and requirements, by providing the time, encouragement, equipment, materials, training, etc. - including discipline as appropriate.
- ✓ Accurate and timely reporting of all incidents.
- ✓ Participate in health and safety-related activities.

☐ Health and Safety Professionals:

- ✓ Exhibit and encourage safe work behavior.
- ✓ Communicate lessons learned, best practices, information and materials across the corporation.
- ✓ Support management's accountability for a healthy and safe workplace by:
 - Analyzing performance results, trends and emerging issues to assist management in targeting needed resources.
 - Providing timely, accurate, cost effective regulatory review, interpretation and guidance.
 - Identify and report potential improvement areas to management.
 - Recommend options to resolve identified issues.
 - Assist management with health and safety compliance or process issues.
 - Assess and measure compliance and safety program effectiveness.
 - Report results to management.
 - Positively represent The Company before clients, regulatory agencies and on trade associations/industry groups.

3 Programs/Requirements:

3.1 The Company Health and Safety Policy Statement:

3.1.1 The Corporate Health and Safety Policy Statement is a reflection of The Company's values specifically related to the Corporation's expectations for health and safety performance by all of its employees.

- The Corporate Health and Safety Policy statement must be posted in a highly visible area in every Company location.
- Health and Safety Policy Statements can be obtained by contacting the Health and Safety Department.

3.2 Health and Safety Programs:

3.2.1 Health and safety programs define The Company's minimum requirements that apply to all Company employees.

- Health and safety programs shall be compiled into a manual for general reference and training.
- The manual shall be made available in either electronic or hard copy media so that every employee will have access to the information.
- The Health and Safety manual reflects all applicable health and safety requirements.
- All personnel shall become familiar with the information contained in the Health and Safety manual that applies to their scope of work.
- Employees shall receive a Health and Safety handbook that provides a basic reference to the requirements contained in the safety manual.
- The Health and Safety handbook shall be readily available to the employee as a quick and handy reference when safety concerns/questions arise during the course of work.

3.3 Health and Safety Training:

3.3.1 Providing employee health and safety training shall be the responsibility of each location Manager and Supervisor.

3.3.2 Health and safety training that is required by the Company, client, OSHA, EPA, DOT or another governmental agency shall be formally addressed by health and safety training lesson plans and basic training materials located on the Company Health and Safety website.

- Training documentation must be kept for each training session conducted.
- Training documentation must include:
 - ✓ Date of training
 - ✓ Location (region, shop, etc.)
 - ✓ Name of training topic(s)
 - ✓ Name of instructor
 - ✓ Student names
 - ✓ Student signatures
 - ✓ Last four digits of Social Security Number
 - ✓ Verification of understanding method used (tests, demonstration, certification, etc.)
- Training documentation shall be kept at the region or shop location.

3.4 Workplace Safety / Inspections:

- 3.4.1 Jobsites, materials, and equipment shall be inspected frequently by a competent person. Inspections shall be documented.
- 3.4.2 A worksite inspection, pre-task Analysis or job safety analysis must be conducted daily, before work commences, for non-routine jobs, jobs where more than two workers are present, unfamiliar locations or by client requirement.
- 3.4.3 Only qualified employees are authorized/allowed to operate equipment.
- 3.4.4 Employees shall be instructed in the recognition and avoidance of unsafe conditions.

3.5 Safety Briefings:

- 3.5.1 Safety briefings, tailgate meetings or pre job meetings, shall be provided to employees prior to being assigned a new work activity or before initiating non-routine or complex job tasks.
 - Supervision or anyone who is knowledgeable in the hazards and corresponding safety measures associated with the job may provide the briefing.

3.6 Safety Meetings:

- 3.6.1 Each Region, Fabrication or Overhaul Shop, Warehouse, Technical Services and Commissioning must conduct a minimum of one safety meeting each month for the employees at that location.
- 3.6.2
 - Meetings may be conducted at a central location for small or satellite locations.

3.6.3 Each Region, Fabrication or Overhaul Shop, Warehouse, Technical Services and Commissioning employee is required to attend a minimum of one safety meeting per month (attendance at customer location accepted).

3.6.4 A safety meeting attendance record shall be kept for each meeting.

Safety meeting records shall be retained by the region or shop.

3.7 Safety Recognition Programs:

3.7.1 The Safety Recognition Program is established to recognize excellence in safety performance by Region, Fabrication and Overhaul Shop locations and specified individuals within the operational groups.

The recognition programs will be administrated by the Health and Safety Department.

3.8 Incident Reporting and Recordkeeping:

3.8.1 All work related incidents shall be reported as described in the Company Incident Reporting Procedures.

3.8.2 All work related incidents shall be investigated to provide information and lessons learned to prevent the incident from recurring.

✓ If the investigation determines that the incident is complex or warrants further in-depth investigation, the Safety Dept. shall facilitate a full root cause investigation.

3.8.3 Incident related corrective actions must be tracked to completion and actions documented.

3.9 Safety Performance Statistics:

The Health and Safety Department shall maintain statistical records, at a minimum, for the following categories:

✓ Occupational injuries/illnesses (OSHA recordable injuries and illnesses – including restricted duty and cases with days away from work).

✓ Statistical reports shall be distributed by the 15th working day of the new month for the preceding month's performance.

3.10 OSHA Investigations and Inspections:

3.10.1 OSHA investigations and inspections may occur at any time. Each location is responsible for the inspection or investigation requested to take place.

✓ A guidance protocol for OSHA investigations and inspections is contained in Exhibit G-1.2.

✓ The Health and Safety Department is available to assist in the investigation/inspection and post-investigation/inspection process.

4 References: None.

5 Exhibits:

G-1.1 Principles of Preventability

G-1.2 OSHA Investigation and Inspection Protocol:

G-1.1 Principles of Preventability:

The principles of preventability are based on the National Safety Council's Defensive Driver's Course.

Preventability does not concern itself with who was to "blame" for a collision; instead it asks, "did our driver take every reasonable precaution available to avoid being involved in the collision". It requires our driver to be knowledgeable of, and alert to, situations that breed collisions and to practice driving techniques that avoids or defends against such situations.

A driver is generally presumed to have had a recordable collision whenever it involves one or more of the following:

- Backing.
- Hitting a fixed object.
- Running into a vehicle ahead.
- Striking a pedestrian.
- Driver misjudged available clearance (in front, behind, to the side, on top and beneath).
- Driver was not operating at a speed consistent with the existing conditions of the road, weather, traffic, and sight distance. Examples:
 - ✓ Driver did not control speed so the vehicle could not be stopped within assured clear distance.
 - ✓ Driver did not yield right-of-way to avoid vehicle collision.
- The process of determining recordability is accomplished by analyzing the collision to discover if our driver committed an error in driving that contributed to their being involved. A list of driving errors is included below to assist in this process.
- The following cannot list every type of vehicle collision that may be encountered; nor can it list all the factors that may be involved in a given vehicle collision. It does cover the most common aspects relating to the principle types of vehicle collisions. Therefore, through thorough investigation, a determination of recordability can be obtained.
 - ✓ Intersections:

It is the responsibility of the company driver to approach, enter, and cross intersections prepared to avoid vehicle collisions that might occur through the actions of others. Complex traffic movement, blind intersections, uncontrolled intersections, or failure of the other driver to conform to laws or traffic control device will not automatically classify

a vehicle collision as non-recordable. Intersection collisions may be recordable even though the company driver has not violated traffic regulations. Failure to take precautionary measures prior to entering the intersection is factors that will be considered in making a decision.

✓ Fixed Objects:

Collisions with fixed objects are recordable vehicle collisions. They usually involve failure to check or properly judge clearances, failure to maintain speed safe for existing conditions, or maintain vehicle under control.

✓ Backing:

Most backing collisions are recordable. A driver is not relieved of their responsibility to back safely when another person, as a guide, is involved in the maneuver.

✓ Single Vehicle Collision:

Most single vehicle collisions, involving overturning or running off the road are recordable. This type of vehicle collision may result from emergency action by the driver to preclude being involved in a collision. Examination of the driver's procedure prior to the incident may reveal speed too fast for conditions or other factors. The driver's actions prior to involvement should be examined for possible error.

✓ Vehicle Ahead:

Collision with the car ahead is recordable. Regardless of the abrupt or unexpected stop of the vehicle ahead, a driver can prevent striking the vehicle ahead by maintaining a safe following distance at all times. This includes being prepared for possible obstructions on the highway, either in view or hidden by the crest of a hill or curve of the roadway. Overdriving headlights at night is a common cause of hitting the car ahead.

✓ Vehicle Behind:

Investigation often shows that drivers risk being struck from behind by failing to maintain a margin of safety in their own following distance. Being struck from behind by other vehicle may be recordable if:

- Vehicle was improperly parked.
- Driver failed to signal a turn at an intersection.
- Driver made sudden stop to park.
- Driver was passing slower traffic near an intersection and had to make a sudden stop.

✓ Struck from behind by other vehicle is non-preventable if:

- Driver's vehicle was legally and properly parked.
- Driver was proceeding in his own lane of traffic at a safe and lawful speed.
- Driver was in proper lane waiting to make turn.
- Driver was stopped in traffic due to existing conditions or was stopped in compliance with traffic sign or signal or the direction of a person legitimately controlling traffic.

- ✓ **Oncoming:**

It is extremely important to check the action of the company driver when involved in a head-on or sideswipe vehicle collision. Exact location of vehicles, prior to and at point of impact, must be carefully verified. Even though an opposing vehicle enters the company driver's lane, it may be possible to avoid the collision. Sideswipe and head-on collisions may be recordable if:

 - Driver was not entirely in the proper lane of traffic.
 - Driver did not pull to the right, slow down and stop for vehicles encroaching on their lane of travel when such action could have been taken without additional danger.

- ✓ **Passing:**

Failure to pass safely indicates faulty judgement and the possible failure to consider one or more of the important factors a driver must observe before attempting the passing maneuver. Unusual actions of the driver being passed or of oncoming traffic might appear to exonerate a driver involved in a passing collision, however, the entire passing maneuver is voluntary, and it is the driver's responsibility to accomplish it without a collision. Vehicle collisions while passing may be preventable if:

 - Driver passed where view of road ahead was obstructed by hill, curve, vegetation, traffic, adverse weather conditions, etc.
 - Driver attempted to pass in the face of closely approaching traffic.
 - Driver failed to warn the driver of vehicle being passed.
 - Driver failed to signal change of lanes.
 - Driver pulled out in front of other traffic, overtaking from rear.
 - Driver cut in short returning to right lane.

- ✓ **Being Passed:**

Sideswipes and cut-offs involving company driver while they are being passed may be recordable when they fail to yield to the passing vehicle by slowing down or moving to the right where possible. Collisions while being passed are preventable if:

 - Driver failed to stay in his own lane or move to the right and hold or reduce speed to permit safe passing.

- ✓ **Parking:**

A properly parked vehicle, one that is completely stopped and parked where it is legal, which is struck will be reportable, but considered a non-recordable vehicle collision. However, unconventional parking locations, double parking, parking where prohibited may be judged as recordable.

- ✓ **Pedestrians:**

Traffic regulations and court findings generally favor the pedestrian hit by a moving vehicle. An unusual route of a pedestrian at mid-block or from between parked vehicles does not necessarily relieve a driver from taking precautions to prevent such collisions. Whether speed limits are posted or the area is posted with warning signs, speed too fast for existing conditions may be involved: School zones, shopping areas, residential streets and other areas with special pedestrian traffic must be

traveled at reduced speeds equal to the particular situations. Young and inexperienced operators generally operate bicycles, motor scooters, and similar equipment. The driver who fails to reduce speed when this type of equipment is operated within sight distance may have failed to take the necessary precautions to prevent a collision. Keeping within posted speed limits is not taking the proper precautions when unusual conditions call for voluntary reduction of speed.

- ✓ Miscellaneous
Projecting loads, loose objects falling from the company vehicle, loose chains, doors swinging open, etc., resulting in damage to vehicle, or other property or injury to persons, may be preventable when the driver's actions or failure to secure them are evidenced.

EXHIBIT G-1.2 OSHA Investigation and Inspection Protocol:

An OSHA Compliance Safety & Health Officer (CSHO) may request to inspect and/or investigate the workplace for one of the four following reasons:

- Routine inspection, normally computer random selections;
- Employee complaint to the OSHA office;
- Another agency referral from EPA, DOT, etc.; or
- An accident in which there is a fatality, or which hospitalizes three or more employees or defined as a significant event. This is usually the only OSHA investigation or inspection in which prior notice of their arrival is provided.

The following guidelines should be followed by the location if an inspection is requested by the agency.

- Arrange for the CSHO to immediately be referred to the facility person in charge. The facility person in charge must immediately contact the safety department.
- The facility person in charge should request to see the CSHO's credentials to determine that he/she is a representative of the Department of Labor. Treat the CSHO with courtesy. Be professional and cooperative.
- Ask if the CSHO is inspecting for a specific complaint, is on a routine inspection, or other reason.
- If it is a specific complaint, request a copy of the complaint and make sure you understand the nature of the complaint.
- If it is an agency referral, request a copy of the referral.
- If a warrant is presented, closely review it so the contents are understood. Call your legal counsel for assistance. The warrant defines the limits of the inspection and you can insist that the CSHO not exceed those limits.

Please note: Anything the CSHO observes while in route to the inspection area, may also be investigated. Escort the CSHO in the most direct route.

- ❑ The facility person in charge has the right to request a warrant prior to an inspection being conducted. The facility person in charge should make this decision after consulting with company Legal and Safety Departments. All facts and circumstances should be considered before making this decision. If the decision to require a warrant is made, do not allow an inspection until the CSHO produces a warrant.
- ❑ In addition to knowledgeable supervisory personnel, the facility person in charge will determine which employee(s) will accompany the CSHO.
- ❑ Inform the CSHO that we reserve the right to tape record pre and post interviews.
- ❑ During the inspection, the following should be avoided:
 - ✓ Admitting to any violation,
 - ✓ Talking 'off the record',
 - ✓ Conducting special demonstrations,
 - ✓ Guessing or offering estimates of any kind, and
 - ✓ Showing CSHO's any confidential materials
 - ✓ Consider stopping work at the job site while the CSHO is inspecting. This will devote the employee's full attention to the CSHO during the discussion. Whether the job is shut down or not, the CSHO shall not interfere with the employees' attention to the job.
 - ✓ During the inspection, gather the same data (air samples, noise samples, photographs, etc.) as the CSHO. Ask the CSHO for split samples, if taken.
 - ✓ Usually an exit interview will take place. However, if it appears that the CSHO will leave without conducting one, insist upon an exit interview. If at all possible, the facility person in charge, another management person and a Safety Coordinator should be present.
 - ✓ During the exit interview:
 - Notes should be made of all that the CSHO says.
 - Only provide the CSHO with the materials he or she specifically requests.
 - Ask for the recommended means and methods of abatement for each apparent violation.
 - Save all documents from the CSHO. On each write the CSHO's name and the date you received the documents.
 - In general, avoid signing or confirming any record or other documents.
 - If citations are issued, they should be mailed to the facility person in charge. Upon receipt of the citation or any other correspondence from OSHA, contact the Legal and Safety Departments.