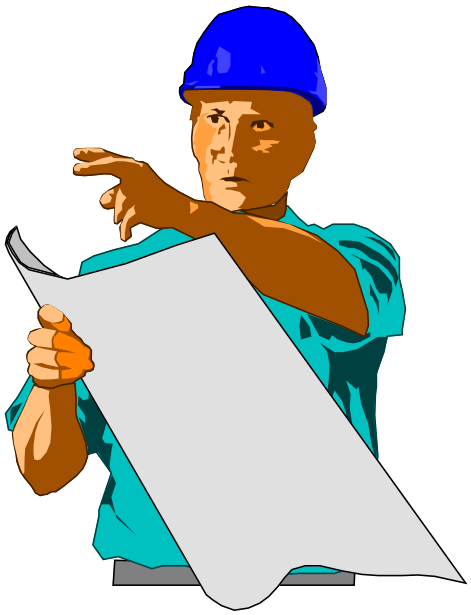
Jack Moore Associates, Inc.

Prime Drilling & Sawing Services™

CUTTING CONCRETE SAFELY



FOR OVER 30 YEARS

Prime Drilling & Sawing Services™ div. of Jack Moore Associates, Inc.
13 McCracken Rd., Millbury, MA 01527
PHONE (508) 853-3991 • FAX (508) 793-9864
email estimates@primedrilling.com

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Jack Moore Associates, Inc.
Prime Drilling, Sawing, and Anchoring div.
1.1 Safe Work Environment Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

1.1.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the importance of maintaining a safe work environment. All employees shall be trained to recognize hazards, the proper use of personal protective equipment, and the care and maintenance of personal protective equipment. It is our goal to provide full information and training to each employee in order to assure the safest possible working conditions.

1.1.2 Program Management:

The Jack Moore Associates, Inc. Safe Work Environment Program shall be managed by Peter E. Michaud, who shall be responsible for:

(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(f) File appropriate reports with respective governmental authorities.
(g) Handle all requests for Safety Data Sheets (SDS) and chemical listings on a timely basis.

1.1.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Safe Work Environment Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

1.1.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc. These should be submitted in writing to the Program Manager who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

1.1.5 Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to Understand"** station and all employees shall be notified of its location.

1.1.6 General Safety Rules:

Where the possibility of injury, possibility of fire, explosion, or exposure to toxic chemicals may be present. strict safety precautions must be adhered to at all times. Jack Moore Associates, Inc. will provide appropriate training for those employees required to operate machinery and equipment. All employees who must work on, or near, in-plant machinery or jobsite equipment, are required to observe all safety warnings posted on this equipment, and all safety guards must be in place during operation of this equipment.

Where personal protective equipment (PPE) is suggested by the manufacturers of this machinery, Jack Moore Associates, Inc. will provide approved PPE. Where no suggestions are made, management may require employees to wear certain PPE as is deemed necessary for the safety of the employee. This PPE will also be supplied by Jack Moore Associates, Inc. and fitted to each individual.

Where employee owned equipment is used, it is the responsibility of Jack Moore Associates, Inc. to ensure the adequacy of the equipment. The program manager shall determine the adequacy, maintenance, and sanitation of the equipment.

A clean and orderly work area must be maintained at all times, to avoid accidental tripping and falls. Spillage of any materials such as oils, chemicals, water, etc., must be promptly cleaned to prevent slips and falls.

1.1.7 First Aid/ Fire Extinguishers:

Appropriate First Aid kits will be provided for each branch and/ or jobsite location. First aid kits shall consist of appropriate items which will be adequate for the environment in which they are used. For construction operations, items shall be stored in a weather-proof container with individual sealed packages of each type of item. First Aid kits will also be provided for each vehicle used to transport employees and equipment to jobsite locations. In the event of any injury, however minor, it is required that the incident be reported immediately to the supervisor. The supervisor will determine the severity of the injury and take appropriate measures, i.e. call 911, transport injured party to medical assistance,

administer first aid, etc. Items used from any First Aid kit will be replenished before the next workday and First Aid kits will be inspected on a weekly basis.

In the absence of an infirmary, clinic, hospital, or physician, that is reasonably accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first-aid training from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence, shall be available at the worksite to render first aid. A valid certificate in first aid training must be obtained from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence.

Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities shall be provided within the work area.

All employees, whether at the office or at a remote jobsite, must be aware of the locations of first aid equipment, fire extinguishers, and the nearest telephone in the event of an emergency. Where specific hazards are present, each employee must adhere to specific safety precautions. Refer to "Hazard Communication Program", "Fall Protection Program", "Respiratory Protection Program" and "Confined Space Program."

Fire extinguishers are placed at strategic locations throughout the facility at 13 McCracken Rd., Millbury, MA 01527. Fire extinguisher location maps are also placed in conspicuous locations to aid in locating extinguishers in an emergency. Fire extinguishers are assigned to all vehicles and are inspected annually by a professional service company. *CALL 911*. Under no circumstances should anyone attempt to extinguish a flame without first calling 911 or asking another employee to call 911 while using the extinguisher.

1.1.8 Trenching & Excavations:

When entering a trench make sure an appropriate trench box has been installed. Never enter a trench without proper shoring or trench box. Always have a ladder or a means of quickly evacuating a trench. A man watch is required above the trench in case of emergency. Never place tools or equipment near the edge of trenches. Proper personal protection equipment shall be worn at all times.

Employees shall not allow unauthorized persons to enter restricted areas of the premises or jobsite where hazards may be present, unless properly informed, equipped with required PPE, and accompanied by an employee of Jack Moore Associates, Inc. at all times. Supervisors must be notified of the presence of non-employees in all cases.

1.1.9 Vehicle Safety:

Vehicles must pass the Massachusetts enhanced emissions inspection as required by law.

In addition, the operator of each vehicle is required to evaluate the safe operating conditions of the vehicle they are using each day. Any malfunctioning device must be immediately reported to the supervisor and corrective action must be taken. This

includes but is not limited to, all automotive glass, mirrors, windshield wipers, back up alarms, horn, directional signals, seat belts, brakes and steering. Fluid levels shall be checked on a daily basis before operation.

Operators must have a valid driver's license of the proper class for the vehicle they are using. Currently a class D license covers each company vehicle (under 26,001 lbs. GVW). All restrictions must be observed including but not limited to corrective lenses, restricted hours of operation, night blindness, etc.

Operators are expected to obey all traffic laws including posted speed limits. Jack Moore Associates, Inc. will not be responsible for fines incurred as a result of traffic law violations. Repeated violations may be subject to review and disciplinary action may be taken.

1.1.10 Substance Abuse:

It is strictly forbidden for any employee to be in possession of, or under the influence of any substance which may cause impairment during working hours. Certain prescription drugs will be evaluated on a case by case basis and employees who must, upon the advice of a physician, take medication(s) which may impair ability, will not be allowed to operate machinery or handle hazardous materials while taking such medication(s).

Employees found to be in violation of this rule, will be evaluated on a case by case basis. Disciplinary action will be taken according to the severity of the violation, and the employee may be advised to seek professional assistance. Failure to comply may result in separation from employment.

Many construction projects and industrial facilities maintain a "drug free" worksite. They employ random drug testing. If you are assigned to such a worksite, you will be required to take the drug test. A positive test, or your refusal to participate in this test, may result in separation from employment.

1.1.11 Hazardous Materials Locations:

A complete written Hazard Communication Program is posted and a complete listing of all hazardous materials known to be present in the workplace shall be made available at all times for review by all employees. Corresponding Safety Data Sheets have been made available at the **"Right to Understand"** station in each branch. SDS shall also be available at individual work areas where applicable.

1.1.12 Accident Investigation:

Accidents may or may not cause personal injury. In the event of an accident the supervisor must be notified immediately. Personal injury accidents must be handled as described above under "**First Aid**." Under no circumstances is the operator to offer information, make statements, or surrender equipment to anyone without on-site representation from a Jack Moore Associates, Inc. supervisor. It is the duty of the operator to record all pertinent information as to how the accident occurred, who was involved, and whatever other information might be important.

1.1.13 Returning to work/ Modified (Light) duty:

In the event of an on the job injury which may limit the ability of the employee to perform his/her normal duties, the immediate supervisor shall conduct a complete evaluation of the situation, including but not limited to:

- A review of the accident investigation and recommendations to avoid a repeat of the incident.
- The employee's ability to perform normal duties before the incident, and provide additional training if required.
- A complete evaluation by a qualified physician, and their recommendations of limitations, i.e. lifting, reaching, or length of workday.
- Encourage the employee to follow the physician's instructions and maintain a program of physical therapy when recommended.

The goal is to return the employee to normal duties as soon as it is physically safe to do so. Giving the employee a "Desk Job" is not the answer. Although each case will be handled on an individual basis, the injured employee should return to normal duties much sooner if exposed to the same environment and fellow employees, acting more as a helper during the recovery process. All employees should be aware of the injured employee's limitations and not allow the possibility of re-injury.

1.1.14 OSHA Inspections:

OSHA personnel must always be treated with courtesy and professionalism. Never offer any information without first contacting your supervisor. (See section 3.7)

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1.2 Safety Communication Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

Motivate employees to increase their awareness of health and safety related issues through discussions, tool box talks, safety bulletins, posters, films, and praise.

1.2.2 Program Management:

The Jack Moore Associates, Inc. Safety Communication Program shall be managed by Peter E. Michaud who shall be responsible for:

(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(f) File appropriate reports with respective governmental authorities.

1.2.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Safety Communication Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

1.2.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

1.2.5 Communication Program

1) Jobsite
   a) Weekly tool box talks
   b) Monthly Supervisor safety meetings.

1.2.6 Weekly Tool Box Talks

Pre-printed safety topics relative to our industry are sent to the jobsite with the foreman to conduct a short meeting to read and discuss the elements of the safety topic. The supervisor reviews the topic with the foreman to add comments and points related to the topic.

1.2.7 Monthly Supervisor Safety Meetings

This meeting is conducted at the jobsite with the foreman and employees and usually last about an hour. Safety topics are discussed more in detail. The use of articles pertaining to events that occurred at other sites are discussed as well as any new products relating to safety might be introduced for employee input.

2) Office
   a) Quarterly Meetings
   b) Safety Bulletins
   c) Posters
   d) Films and Power Point Presentations
   e) Special Training

1.2.8 Quarterly Meetings

This meeting is conducted at the main office for all employees to discuss new problems, accidents and near misses. The Pre-Task Planning Program is reinforced with examples of excellent plans and plans that could have used more pre-thought. Discussions from employee safety related suggestions are tabled. Any new safety devices or power tools would be demonstrated and discussed more in detail during this meeting.

1.2.9 Safety Bulletins

Safety Bulletins are used to provide factual information from case histories of actual events that occurred at other worksites. This means of communication is more effectively transmitted through open discussion rather than just pinned up on a wall. Once the story is read and understood the incident is gone over from a "what could have been done differently to avoid the accident" approach that sparks safety awareness that is brought back to the sites our employees are working on. These discussions also enhance the Pre-Task Planning Program.

1.2.10 Posters

These make a more immediate and emotional impact. They appeal more to the instinct for self-preservation by giving graphic examples of what can go wrong and how to avoid accidents. The whole goal is to get the employee's level of safety awareness risen to promote safe thinking.

1.2.11 Films and Power Point Presentations

These are most useful in training programs, but they can be included in more formal communication sessions as a basis for discussion. The advantage of films is their visual and dramatic appeal, but it is essential to avoid treating them simply as light relief. Some films available are accompanied by discussion notes, which should always be used to emphasize the lessons learned from the films.

1.2.12 Special Training

Bringing in outside professional EH&S people to do specific training on programs such as confined space procedures, aerial lift use, and others supplement the safety program's goal for an injury/incident free workplace. All such training shall be documented and maintained on file at Jack Moore Associates, Inc., 13 McCracken Rd., Millbury, MA 01527.

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1.3 Safety Goals

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

1.3.1 Program Objective:

It is our objective to design and implement a safety program that builds a Zero Incident Safety Culture.

1.3.2 Program Management:

The Jack Moore Associates, Inc. Safety Goals Program shall be managed by Peter E. Michaud who shall be responsible for:

(a) Program implementation.
    1) Management Level
    2) Supervisory
    3) All Employees
(b) Maintenance of complete and up-to-date records and documentation.
(c) Manage all questions and concerns regarding the program.
(d) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.

1.3.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the. Jack Moore Associates, Inc. Safety Goal Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

1.3.4 Management Goals

- Ensure personal compliance to meet all Environment, Health & Safety (EHS) standards on and off the job.
- Take immediate action to correct any substandard conditions or behaviors that are encountered.
- Create opportunities to send loud and clear messages that reinforce the commitment to working “Incident and Injury-Free”.
- Keep stressing the vision of “Incident and Injury-Free” work with focus on caring for people, employees, and contractors, not numbers.
- Speak often about safety, and when you speak, speak about what is possible in being committed to an “Incident and Injury – Free” worksite.
- Acknowledge and appreciate individuals and teams who have improved safety performance and attitude.
- Make requests of your direct reports that result in more communication regarding safety within the organization.
- Assess safety performance and activities as part of performance review and bonus allocation.
- Only promote individuals having proven safety performance.
- Reinforce that there is a “SAFE ZONE” around safety and that anyone can stop any unsafe work without fear of retribution.
- Make safety discussions a part of every meeting.
- Participate in leading safety training, employee orientations or other safety and health related activities at least once per year.
- Personally attend and present at recognition venues.
- When visiting sites, be visible in the field, walk around and coach, check compliance, and ask specific questions regarding the use of risk assessments etc. If possible be present at site safety meetings and speak about your convictions.
- Personal driving habits follow the rules on and off the job.

1.3.5 Supervisory Goals

- Same as the above **PLUS**
- Be the first to take part in new safety training initiatives.
- Issue at least monthly, a Site Safety Report that has your personal message in it as related to that month's performance.
- Lead by example and be prepared to participate.
- Be visible in the field at least weekly:
    - ○ Talk to employees and contractors about safety.
    - ○ Participate in site safety meetings.
    - ○Participate in worker orientations or inductions.
    - ○ Ask for their input on safety and then listen.
    - ○ Be involved in safety inspections.
    - ○ Perform task observations.
    - ○ Coach employees when substandard actions are noticed.
    - ○ Ask employees and contractors about the risk assessments they have conducted that day.
- Communicate the importance of incident investigation:
    - ○Have supervisors explain incidents that happened in their areas of responsibility.
    - ○ Report to work force the results of all major incident investigations.
- Personal driving habits follow the rules on and off the road.

1.3.6 All Employees

- Everyone has the responsibility and is empowered to take personal leadership to:

  ○ Ensure personal compliance to meet all Environmental Health & Safety standards.

  ○ Take immediate action to correct any substandard condition or behaviors.

  ○ Ensure work areas and equipment are in safe condition.

  ○ Ensure that every task/job performed is done safely and with no adverse health consequences.

  ○ Identify, assess, control, and report hazards using Hazard Communication programs such as Pre-task Planning or Job Hazard Analysis.

  STOP and THINK
  Stop frequently to analyze.
  Think continuously to anticipate and especially every time something changes.

  IDENTIFY THE HAZARD
  Ask what could go wrong and anticipate all the possibilities.

  ASSESS THE RISKS
  Ask how bad could it be?
  Ask how could I be hurt?
  Ask how could others be hurt?

  CONTROL THE RISKS
  Ask what could I do about it?
  Take action by changing position, method or get help.
  Report it to my supervisor.

  RESUME WORK
  Safeguard and watch out for co-workers.
  Identify new workers and help coach them to learn proper work activities.
  Follow established procedures.
  Identify and communicate situations where procedures are not adequate or do not exist.
  Ask for help if skills, physical capabilities and/or knowledge are not adequate to do the task.
  Refuse work deemed unsafe and report to your supervisor.

1.4 Safety Incentive Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

To achieve an injury – incident free workplace through rewards for efforts towards that goal.

1.4.2 Program Management:

The Jack Moore Associates, Inc. Safety Incentive Program shall be managed by Peter E. Michaud who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.

1.4.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the. Jack Moore Associates, Inc. Safety Incentive Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

1.4.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

1.4.5 Program

Prime Drilling & Sawing division of Jack Moore Associates, Inc. has a very low rate of recordables and incidents due to the pre-planning that is taken prior to the task at hand. However, incentive programs are still a valuable tool to keep the technicians mind thinking about safety and how they are about to perform the task. It is important to understand that incentive programs alone do not reduce accidents rather they raise awareness to safety performance. It is said most accidents are caused by unsafe actions. We feel accidents are caused by unsafe thinking.

The Pre-Task Plan has been an invaluable tool to identify hazards prior to the work. It is a checklist that makes the technician do the job in his head prior to plugging in any tool. This not only creates a safer work environment, but also adds to the productivity of the worker because they have thought the job out and know what the next step is going to be. We measure the employee's safety performance individually on the amount of incidents that they have had, but the real measure of the employee's awareness to safety is through Pre-Task Plan Audits. The plan is reviewed on and off site. Our work is pretty repetitive and it is common that some of the same hazards exist on all sites. For instance, when drilling a hole through an elevated slab, you never want the core to drop potentially injuring someone. The steps that are taken to prevent this are similar in nature, but vary due to core sizes, floor thicknesses, or limited access.

The audit that occurs at the jobsite consists of the supervisor walking the job with the foreman and goes over every aspect of the job and looks for potential hazards that the foreman missed and commends ones that were seen and corrected or mitigated. If hazards are missed by the foreman, the supervisor coaches the foreman and the team to better understand the hazard and how to look for items like this in the future. The plan is rated excellent, average or poor. Various gift cards, like Dunkin Donuts, and Home Depot cards are given to the foreman and the team for excellent and average. There is no reward for poor. The amount and type varies depending on the degree of difficulty of the task and the environment. We feel that the reward should be given at the time of the audit. An annual audit is done for recordables, and if there are zero recordables or incidents a sizeable reward is given to each employee with an injury / incident free year. If an employee receives more than three poor ratings per year on a task plan audit, it is considered one incident and precludes them from the annual reward.

1.5 Safety Meeting Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

1.5.1 Program Objective:

To keep all employees consistently aware and thinking of safe behaviors by means of tool box talks, formal open discussion, and through the use of media. Safe thinking results in safe behavior.

1.5.2 Program Management:

The Jack Moore Associates, Inc. Safety Meeting Program shall be managed by Peter E. Michaud who shall be responsible for:

(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(f) File appropriate reports with respective governmental authorities.

1.5.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Safety Meeting Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

1.5.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

1.5.5 Jobsite Program:

1) Weekly jobsite safety meetings – Tool box format – Foreman – Typical duration 30 minutes.

a) Select topic from preprinted material
b) Pass around sign in sheet
c) Conduct meeting in comfortable environment.
d) Read topic sheet aloud pausing occasionally to explain more in detail
e) Open discussion

1) Ask if there any questions on the topic.

2) Discuss job site changes – for instance if there is equipment being moved more frequently on and off the job, discuss spotter responsibilities.

3) Make the meeting more informative and interesting by discussing topics that are relevant to the site.

2) Monthly jobsite meetings – Takes the place of one of the weekly meetings.- Supervisor – Typical duration 1 hour.

Option 1

A) Select recent article discussing accident from another site.

1) Pass around sign in sheet.

2) Distribute article and let employees read.

3) Discuss accident in detail

a) Contributing factors
b) Possible root causes
c) Actions that could of prevented the hazard.

4) Supervisor to write a post event Pre-Task Plan from the suggestions of the employees.

Option 2

B) Select new safety product

1) Discuss uses
2) Demonstrate how and where to use.
3) Discuss advantages/disadvantage
4) Open discussion points

C) If a particular site is having difficulty with a certain issue, discuss that issue and ways to prevent. For instance topics could be:

1) Hand Cuts – Stress the use of gloves
2) Slips – Trips – Stress Housekeeping
3) Back Strains – Stress Proper lifting techniques
4) Eye injuries – Stress eye/face protection for specific activity

Quarterly Office Meeting

1) Takes place in office – conducted by supervisor – upper management and owner present. All employees.

A) Develop Safety Meeting Agenda Form from:

1) New Problems – Accidents or Near Misses
2) New Safety products on the market.
3) New tools to be used in the field.
4) Employee suggestion box.

B) Review Pre-Task Planning Program

1) Discuss any revisions needed.
2) Discuss particular PTP if incident occurred on a job.

C) Movie or Power point on Safety related topic (optional)

Jack Moore Associates, Inc.
Concrete Anchoring Systems™
13 McCracken Rd., Millbury, MA 01527 • (508) 853-3991 • FAX (508) 793-9864

SAFETY MEETING AGENDA

DEPARTMENT/JOBSITE:_____ MEETING DATE:_____

1. Open meeting & present safety topic_____
2. Read minutes from previous meeting
3. Attendees:

_____ _____

_____ _____

_____ _____

_____ _____

4. Old Business – Status of previous recommendations. Discuss pending old business.

5. Accidents – Discuss accidents and near misses that have occurred since last meeting. Brief summary of accidents to date by number and type. Note any trends. Discuss corrective action taken or needed. Concentrate on accident causes to make everyone more aware. Review Pre-Task plans for near misses and accidents.

6. Inspection Reports – Report on findings and recommendations of any inspection reports made since last meeting.

7. New Business – Solicit employee suggestions. Discuss new procedures, changes to company safety policy, etc..

Time Meeting Started_____ Time Finished_____

Meeting Chaired By _____ Title_____

1.6 Management Leadership and Involvement

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

1.6.1 Program Objective:

It is our objective to provide leadership and commitment from top management to effectively protect all workers from occupational hazards. Management shall provide the motivating force and the resources to control activities within the organization. Management shall regard worker safety and health as a fundamental value of the organization. This means that concern for every aspect of the safety and health of all workers throughout the company is demonstrated. Through providing the means through which our workers express their own commitment to safety and health, for themselves and their fellow workers, we expect to achieve full employee involvement.

1.6.2 Program Management:

The Jack Moore Associates, Inc Management Leadership and Involvement Program shall be managed by Peter E. Michaud who shall be responsible for:

(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.

1.6.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the. Jack Moore Associates, Inc. Management Leadership and Involvement. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

1.6.4 **Program Updates:**

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

1.6.5 Actions for Management Leadership

1) Visible Leadership – Get out on the job where you can be seen as someone who cares about safety. Your participation will only encourage our employees to take care of themselves and others because they know you care about them. Talk to our workers and ask them how they are doing. Ask them if there are any areas that need improvement. Compliment them on being safe and coach them if there are actions taking place that are substandard.

2) Assign and Communicate Responsibility – Have a designated team of individuals with distinct responsibilities for the safety of our workers. Without assigning responsibility, there can be no accountability for measuring good or poor performances.

3) Assign Authority and Provide Resources – Everyone has the authority to work safe for themselves and others. Assign safety related goals to the superintendent or Foreman with milestone dates to be measured. Communicate with the superintendent and foremen to make sure they have all the safety tools and power tools they need to perform their job safely.

4) Responsibility, Authority, and Accountability

Managers
a) Personal Safety Behavior
b) Safety Activities
c) Statistical Results
d) Enforcing Company Health and Safety Rules
e) Arranging Safety and Health Training
f) Monitoring – Controlling Workers' Compensation Costs

Supervisors
a) Personal Safety Behavior
b) Making activities safe by ensuring that employees have safety materials and equipment suitable for the task.
c) Enforcing Safety Rules
d) Conducting Safety Meetings

Employees

a) Compliance with Safety Rules.
b) Compliance with Health Rules.
c) Reporting hazards, near misses, and injuries

1.6.6 Employee Involvement

1) Have employees participate with management on safety decisions to give input from the field.

2) Have employees conduct site audits to determine safe-unsafe working conditions.

3) Have employees write Pre-Task Planning worksheets to identify hazards and ways to eliminate the hazards for specific tasks.

4) Implement suggestions from employees to let them know their voice counts.

5) Have employees present programs and presentations at safety meetings.

6) Have employees participate in accident or near miss investigations.

7) Authorize employees to fix hazards within their control.

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1.7 Safety Accountability Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

1.7.1 Program Objective:
To have management provide pro-active support to the program. Strong management support for cost reduction and accountability for results supports program success. To have established goals to be achieved, assign responsibility for attainment of the goals, and reward or penalize management or supervisory staff who are accountable for those results.

1.7.2 Program Management:

The Jack Moore Associates, Inc Safety Accountability Program shall be managed by Peter E. Michaud who shall be responsible for:
(a) Program implementation.
(b) Training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.

1.7.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the. Jack Moore Associates, Inc. Safety Accountability Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

1.7.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

1.7.5 Establish Goals

1) Goals define what the safety engineers and management hope to accomplish together.

2) Goals give direction and clear purpose to safety activities. They must be:

a) Meaningful, to motivate individuals to a desired end result.

b) Achievable, but not too easy.

c) Measurable, with quantifiable benchmarks.

d) Goals must be balanced so they do not prohibit each other from being reached. For example increased revenue goals may increase employee injuries.

1.7.6 Identify Expectations

1) Identify new programs to implement or current programs to enhance.

2) Select a program that will produce the best results.

3) Break down the program into key activities that are essential for implementation or improvement.

4) Assign responsibility and accountability for activities.

5) Set time frames and frequencies for measuring the activities.

1.7.7 Measure Results and Activities

1) Charge Backs – Each jobsite or location can be charged the cost of a loss that occurs at that site. This charge back gives true perspective of the location and the supervisors/managers profitability. It also serves as an internal tool to elevate management awareness.

2) Individual performance Evaluations – Tracking must be frequent and simple. One way to accomplish this is to have the supervisor's immediate manager review activities on a monthly basis to make sure they meet timelines. A checklist should be used to track performance reviews.

In closing:

The primary purpose of a management accountability program is to improve the effectiveness of a safety program by establishing a sense of ownership for reducing injuries.

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Jack Moore Associates, Inc.
Prime Drilling, Sawing, and Anchoring div.
2.1 New Hire Training Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

2.1.1 Program Objective:
To introduce and instill company values, procedures, and safety guidelines to ensure the company is represented in a professional manner. The new hire should come away with a feeling of pride for working for the company.

2.1.2 Program Management:

The Jack Moore Associates, Inc New Hire Training Program shall be managed by Jack Moore who shall be responsible for:
(a) Program implementation.
(b) Employee training for new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.

2.1.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the. Jack Moore Associates, Inc. New Hire Training Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

2.1.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

1) **Orientation**

A) Building – Fellow Employees

1) Introduce new hire to fellow employees
2) Walk new hire through facility.
3) Equipment and Supplies

B) Employment Forms - Policies

1) Time sheets
2) W4, I9
3) Sexual Harassment Policy
4) Holidays
5) Inventory Participation
6) Medical Benefits
7) Sick Time / Vacation Policy
8) Vehicle Accident Policy
9) Employee Information
10) Non-discrimination Policy
11) Substance Abuse Policy
12) Job Technician Report

C) Safety

1) Schedule OSHA 10hour class
2) Safety Manuals
3) Building Safety / Evacuation Routes
4) Vehicle Safety
5) Right to Know Station / Hazard Communication
6) Near Miss /Accident Reporting in Depth

D) Expectations for Successful Performance

1) Quality of work
2) Role of Co-Workers / Team mentality
3) Safety Adherence
4) Courtesy
5) Professionalism
6) Housekeeping
7) Attendance
8) Dress Code
9) Probationary review Schedule
10) Performance management process and schedule of reviews

E) Compensation

1) Salary rate and grade, pay schedule, check distribution (including direct deposit option)
2) Pay increases and how they occur
3) Overtime Pay
4) Per Diem

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2.2 Employee Conduct and Disciplinary Action

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

Please Note. Employee conduct provisions are extremely important. The location of these provisions in this handbook and the order of the following provisions should in no way be construed to lessen the importance of any provision

2.2.1 General policy

Rules of conduct for employees are intended to promote the orderly and efficient operation of the company, as well as protect the rights of all employees. Violations, therefore, shall be regarded as cause for disciplinary action.

Periodic inspections of all work areas will be conducted by the management team to ensure compliance with the rules and requirements of this document.

These rules are published for the employees' information and protection. Ignorance of work rules is not an acceptable excuse for violation. It is each employee's responsibility to know the rules and abide by them. These rules are not all-inclusive, and other departmental or company regulations may exist. Employees are expected to know and abide by those rules as well.

2.2.2 Rules of conduct for employees

Human Resources shall be consulted regarding the consistency of rule interpretation and appropriateness of the penalty being applied for violation of any of the following Rules of Conduct.

Section 1
For violation of any of the following rules, an employee shall be subject to penalties ranging from a formal written warning notice up to, and including, discharge.

A. Neglect of duty.

B. Insubordination or refusal to comply with employer's instructions, unless such instructions are injurious to the employee's safety and health.

C.

1. Immoral or indecent conduct
2. Conviction of a felony
3. Conviction of a misdemeanor involving moral turpitude while an employee of the company
4. Violation of local, state, or federal law which causes unfavorable publicity to the company, impairs the credibility of the employee to perform the employee's job, or is otherwise connected to company employment.

D. Intentional falsification of personnel records, payroll reports, or other company records.

E. Theft, intentional destruction, or defacing of company, employee, or client property. Dissemination of client trade secrets or violation of confidentiality.

F. Deliberate or careless conduct endangering the safety of self or other employees, including the provocation or instigation of violence.

G. Consuming alcoholic beverages while on duty, except at approved company functions, or the possession or consumption of illegal drugs or prescription drugs not prescribed for the employee. This shall include the use of medical marijuana.

H. Abusive, threatening, or coercive treatment of another employee, client, or member of the public.

I. Reporting for work in an unsafe condition, which includes but is not limited to, being under the influence of alcoholic beverages or drugs. An employee who so reports shall be sent home with pay pending investigation.

J. Knowingly admitting an unauthorized person or persons into any locked or restricted building or area of the company.

K. For other offenses of equal magnitude to the above

When an employee engages in conduct in violation of the Section 1 rules and the conduct is committed off-duty and not on company property, the company may discipline the

employee, up to and including discharge, whenever the conduct causes unfavorable publicity to the company, impairs the credibility of the employee to perform the employee's job, or is otherwise connected to employment at the company. Conduct that is off-duty but on company property or that is directed toward company employees, representatives, or property is always connected to employment at the company. Likewise, conduct that is on duty but off company property is always connected to employment at the company.

Section 2
For the commission of any of the following offenses, an employee shall be subject to disciplinary action up to and including discharge. Disciplinary action for the same or different offenses shall progress in the following manner:

1. Verbal Warning—Verbal statement to employee that he/she has violated a rule and/or regulation and that such violation may not continue.

2. Written Reprimand—Formal notification in writing to employee that he/she has violated a rule and/or regulation.

3. Suspension—Loss of work and wages for a specific number of hours or days, but not for more than one (1) work week, depending on the severity of the offense. Notice of suspension is provided to the employee in writing.

4. Discharge—The employer/employee relationship is severed

If an employee receives four warning notices for the same or different offenses within a period of twelve consecutive months, the employee shall, at the time of the issuance of the fourth such notice, be subject to discharge.

A. Excessive absenteeism.

B. Excessive tardiness.

C. Inattentiveness to work, including but not limited to, failure to start work at the designated time, quitting work before proper time, or leaving assigned work area, building, or project during working hours without authorization from appropriate supervisor.

D. Posting unauthorized materials on walls or bulletin boards; defacing or removing authorized material from bulletin boards.

E. Violation of a safety rule or safety practice.

F. Smoking in prohibited areas.

G. Failure to report for work without giving the supervisor or department head notice of absence within two (2) hours after the beginning of the scheduled workday.

H. Vending, soliciting, or collecting contributions on the company's time or premises without prior appropriate authorization from the company.

I. Gambling, lottery, or any other game of chance on the employer's premises during working hours.

J. Any other offense of equal magnitude to the above.

2.2.3 Workplace threats, violence and weapons

The company is committed to the safety and security of all persons. To ensure a safe workplace and to reduce the risk of violence, all employees should review and understand all provisions of this workplace threats, violence and weapons policy.

Threats and violence

The company will not tolerate any threats, threatening behavior, or acts of violence committed by or against employees or on company property. Violations of this policy will lead to disciplinary action up to and including dismissal, as well as arrest and prosecution for any criminal acts.

Weapons

No person shall possess on company property any firearms or other dangerous weapons. Any company employee violating this rule shall be subject to suspension or dismissal. Any person violating this rule will be subject to criminal prosecution.

Prohibited conduct

Employees are prohibited from making threats or engaging in violent activities. This list of behaviors, while not inclusive, provides examples of conduct that is prohibited.

- Causing physical injury to another person.
- Making threats of any kind.
- Aggressive, hostile, or violent behavior, such as intimidation of others; attempts to instill fear in others; or subjecting others to emotional distress.
- Other behavior which suggests a propensity toward violence, which may include belligerent speech, excessive arguing or swearing, sabotage or threats of sabotage of company property, or a demonstrated pattern of refusing to follow company policies and procedures.

- Intentionally damaging company property or property of another employee, or member of the public.
- Possession of a weapon while on company property or while on company business.
- Committing acts motivated by, or related to, sexual harassment or domestic violence.

Dealing with confrontation

Employees who confront or encounter an armed or dangerous person should not attempt to challenge or disarm the individual. Employees should remain calm, make constant eye contact and talk to the individual. If a supervisor can be safely notified of the need for assistance without endangering the safety of the employee or others, such notice should be given. Otherwise, cooperate and follow the instructions given.

Reporting

Company employees **are responsible to notify** their immediate supervisor of any threats they have witnessed or received, or any behavior they have witnessed which they regard as threatening or violent, when the threat or behavior is job-related, or might be carried out on company property, or is connected to employment.

- Reports can be made anonymously, and all reported incidents will be investigated.
- Reports or incidents warranting confidentiality will be handled appropriately and information will be disclosed to others only on a need-to-know basis.
- Employees who have obtained restraining orders or personal protection orders, which include the company property as a protected area, should immediately provide a copy of the order to their supervisor and the Human Resources Department.

Enforcement and discipline

Upon notification, the person making threats, exhibiting threatening conduct, or committing any other acts of aggression or violence on company property shall be removed from company property as quickly as safety permits and shall remain off company property pending investigation. Any employee determined to have committed such acts will be subject to disciplinary action, up to and including termination and/or criminal prosecution. Non-employees engaged in violent acts on company property will be reported to the proper authorities and fully prosecuted.

2.2.4 Drug-free workplace

The company prohibits the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the workplace. All employees must abide by the terms of

this Drug-Free Workplace policy. Employees violating such prohibitions will be subject to disciplinary action, up to and including discharge.
The term "controlled substance" refers to all illegal drugs and to legal drugs used without a physician's order. It does not prohibit taking prescription medication under the direction of a physician.

2.2.5 Smoking Policy

Smoking is prohibited within the buildings of Jack Moore Associates, Inc.

2.3 Safe Work Environment Training Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

2.3.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the importance of maintaining a safe work environment. It is our goal to provide full information and training to each employee in order to assure the safest possible working conditions.

2.3.2 Program Outline:

I. Basic Safety Procedures.

A. Explanation of "Right To Understand" information station.
1. SDS, How To Read.
2. Location(s) of hazardous materials if present.
3. What to do in case of emergency.
(a) Contact immediate supervisor.
(b) Call 911.
(c) Contact poison control.

B. Explanation of General Safety Rules
1. Personal Protective Equipment (PPE).
(a) PPE required for specific operations.
(b) Dangers from not using required equipment.
(c) Disciplinary action for failure to use PPE.

2. Machinery Operation.
(a) OSHA 10 and/or 30 hour outreach program.
(b) Detailed instruction on each piece of equipment.
(c) Observance of warning labels.
(d) Maintenance of safety guards.
(e) What to do in case of equipment malfunction.
(f) Safe driver awareness program

3. Maintenance of Clean, Orderly Work Environment.
(a) Prevention of slips or falls due to spills of oil, water, etc.
(b) Proper placement of tools and equipment.
(c) Proper methods of storage of tools and equipment.

4. Location of Emergency Equipment.
   (a) Fire Extinguishers.
   (b) First Aid Stations.
   (c) Nearest Telephone

II. Specific Safety Procedures.

A. Electrical.
1. Specific instruction pertaining to individual job requirements as site specific conditions dictate
2. Maintenance of a distance of ten feet or more from energized electrical equipment by unauthorized persons.
3. Maintenance of a distance of ten feet or more from energized electrical equipment by all vehicular equipment and mechanical equipment.
4. Authorized employees must adhere to safe approach distances as specified in 1910.333 Table S5 for Alternating Current.
5. Explanation of Assured Equipment Grounding Conductor Program.
6. Explanation of Lockout/Tagout procedures when employees may be exposed to electrical, hydraulic, pneumatic, mechanical, or stored energy hazards.

B. Trenching and Excavations.
1. Proper shoring, sloping, or benching.
2. Proper use and placement of ladders.
3. Proper placement of tools.
4. Watchman above excavation.
5. Restriction of non-employees.

C. Vehicle Safety.
1. Vehicle inspection, yearly.
2. Vehicle inspection, daily.
3. Driver's license class.
4. Restricted operation.
5. Observance of traffic laws.
6. Disciplinary action for violations.

D. Fall Protection.
1. Hazard elimination.
   (a) Recognize potential hazards before they become a problem.
   (b) Perform as many operations as possible from ground level.
2. Environment control.
   (a) Guardrails and handrails.
   (b) Scaffolding and ladders.
3. Fall arrest equipment.
   (a) Proper equipment donning.
   (b) Equipment inspection procedures.
   (c) Tie off/anchorage procedures.
   (d) Fall victim response procedures.

E. Confined Space.

1. Definition of "Confined Space".
2. "Permit Required" confined space.
    (a) Asphyxiating atmospheres.
    (b) Toxic atmosphere
    (c) Flammable or Explosive atmospheres.
    (d) Combustible dust.
    (e) Regulated atmospheres.
    (f) Mechanical/ Electrical hazards. Protective shields, barriers, or insulation shall be used where there may be exposure to the employee.
3. General Procedures
    (a) Restriction to authorized personnel.
    (b) Entrants shall not wear conductive garments unless they can be covered and made non-conductive.
    (c) Illumination must be provided for safe entry and duties in a confined space.
    (d) Employees may not enter a space where exposed energized equipment may be present without proper illumination.
    (e) Medical surveillance program.
    (f) Rescue procedures.

F. Respiratory Protection.

1. Care and use of respiratory protection equipment.
    (a) Donning of equipment.
    (b) Cleaning and storage of equipment.
    (c) Changing filters/cartridges.
    (d) Evaluation of degree of exposure.
    (e) Communication with watchman.
    (f) 42 CFR 84 NIOSH requirements.

G. Clean Room Operations.

1. Importance of cleanliness.
    (a) Wiping, wrapping of equipment.
    (b) Proper handling of wrapped equipment.
    (c) Washing equipment before entrance to clean room.
2. Importance of schedule.
3. Observation of permits and protocol.

G Pre Task Planning (Example Below)

1) Hazard recognition
2) Hazard Assessment
3) Engineering Controls

Company: Prime Drilling Foreman/Supervisor:

Safety Rep:

Date:_____ Start Time: ____Contact #: _____ SIPP/WP#: ___

Project/Equip ID/System:_____

_____

Work Description: _____

Nearest Exit: _____ Nearest Phone: _____ Fire Extinguisher: _____

Pull Station:_____ Eye Wash/Shower:_____

Nearest Exit: _____ Nearest Phone: _____ Fire Extinguisher: _____

Pull Station:_____ Eye Wash/Shower:_____

Required Permits

☐ LSS ☐ APCI ☐ SMS
☐ SIPP ☐ Dirty Work
☐ Energized Elec. Work (EEW)
☐ Yellow card ☐ Confined Space
☐ Critical Lift (Crane) ☐ MIR
☐ Hot Work (Non-Electrical)
☐ Exhaust Balance Permit
☐ Flush Discharge Permit

Task Specific Check List

☐ Pre-Job Security Checklist
☐ Excavation Checklist
☐ MEWP/PIT Daily Checklist
☐ Raised Metal Floor Checklist
☐ Equipment Demo Work plans

Personal Protection Equipment

☐ Hard Hat ☐ Safety glasses
☐ Face Shield ☐ Goggles
- Gloves: ☐ Leather ☐ Acid ☐ Solvent ☐ Kevlar / Cut resistant ☐ Arm Sleeves
- Foot protection: ☐ Boots ☐ Steel-Toe ☐ Toe Covers ☐ Ear Plugs / Muffs
☐ Safety Vest ☐ Respirator
☐ Chemical Resistant Suit / apron
☐ Energized Elect Work PPE
☐ Additional PPE (see comments)

Hazards	Safe Plan of Action (SPA)
Material Movement & Handling	☐Tool or equipment move ☐ Inspected movement path ☐ Identified moving equip (forklift, pallet jack, carts) ☐ Wheels Chocked ☐ Floor Plating (pinch / back) ☐ Awkward size/shape ☐ Lay-down area established ☐ Spotter ☐ Debris Removal plan ☐ Hand protection required ☐ Hand/ body positions to avoid injury ☐ Safe lifting plan established for items over 35 lbs
Slips, Trips Falls	☐ Inspect for trip / slip hazards ☐ Area clean / clear of debris ☐ Hazards marked ☐ Tools & material properly stored ☐ Electrical / emergency equipment clear
Hand / Cut / Bump Hazards	☐ Inspected work area for sharp edges ☐ Found sharp edges and protected ☐ Inspected walking paths ☐ Identified bump hazards and marked
Hand & Power Tools:	☐ Reviewed safety requirements ☐ Inspected condition ☐Guarding OK ☐ GFCI in use ☐Identified PPE required ☐ Inspected Elect cord ☐ Routed cord overhead or taped / barricaded ☐Sawzall Approval
Chemical & Gas Hazards	☐ Area inspected for potential chem. Hazard ☐ MSDS Sheet available ☐ Identify PPE for highest recognized hazard ☐ Reviewed Decon / Disposal or storage procedures ☐ Reviewed contingency plan and equip is on hand ☐ All inert gases are controlled so no O_2 deficiencies

Fall Protection ☐ Ladder Inspection completed ☐ Retractable Device Required ☐ Inspected Fall Protection Equip. ☐ Shock Absorbing Lanyard Required ☐ Horizontal lifeline System Req'd. ☐ Anchorage Point Identified ☐ Fall Clearance Distance Adequate ☐ Fall Rescue/Retrieval Plan Set Up **Impacts** ☐ Drilling, coring, roto-hammering ☐ Production tools (EMOs or EGOs) ☐ Within 4ft of stockers or AMHS ☐ Standing or climbing on utilities or equipment ☐ Factory tools ☐ Fire detection or suppression (Sprinkler head checklist attached) ☐ Shower or eye wash ☐ Leak detection ☐ Gases or BCDs ☐ Evacuation Spkrs ☐ Security systems (penetrations to walls, roof, card readers, etc.) ☐ Life Safety systems ☐ Ion emitters ☐ Protection of facility equipment ☐ Other	**Hazardous Energies**	☐ Lock Out/Tag Out/Verify ☐ Confirm that equipment is de-energized ☐ 1 Lock / 1 Key / 1 Person ☐ Double block & bleed Mechanical | Electrical | Chemical | Thermal | Stored | Radiation
	Non-Electrical Hot Work	☐ Fire Extinguishers ☐ Fire watch ☐ Install weld / spark screens ☐ combustible material removed / protected ☐ Adequate ventilation
	Excavation	☐ Reviewed as-builts/ Locate scans ☐ Barricades provided ☐ Proper sloping/shoring ☐ Access/egress provided ☐ Excavation Inspected by competent person ☐ Hand dig areas are clearly marked ☐
	Scaffolds	☐☐ Competent person perform daily inspection ☐ Condition tags in place ☐☐ Properly secured / wheel locks ☐ Toe boards used ☐ Footings adequate
	Vehicular Traffic	☐ Traffic Barricades ☐ Cones ☐ Signs ☐ Flagmen ☐ Lane closure ☐ Fire Lane is clear ☐ Redirection/interruption of traffic
	Crane or other Lifting Equipment	☐ Lifting / Rigging equipment inspected ☐ Tag lines in use ☐ Areas barricaded ☐ Overhead Utility clearance Verified ☐ Signalman assigned ☐ All have reviewed the lift plan Proper Licensing
	Barricades	☐ Yellow barricade tape ☐ Red barricade tape ☐ Rigid barricade required / secured to floor ☐ Barricade Signage ☐ Emergency Egress pathways clearly marked ☐Travel paths clearly identified and barricaded to protect foot traffic
	Environmental Weather Crew Congestion	☐ Storm Water Protected ☐ Hazardous waste plan ☐ Dumpsters covered ☐ Dust Controls in place ☐ Recycling plan ☐ Flushing or discharge of fluids ☐ Review plans for weather including snow/ice/heat/wind ☐ Liquids available ☐ Cool down periods ☐ Sun Screen ☐ Heat Stress symptoms ☐ Inspect areas for impacts to other crews ☐ Coordinate with adjacent work supervisors

	Ergonomics & Awkward Postures	☐ High Hand Force ☐ Vibration ☐ Repeated Impacts ☐ Repetitive Motion ☐ Static Postures ☐ Shoulders ☐ Neck ☐ Back ☐ Knees ☐ Arms

Hazard Specific to the Site

Will soils, roofing materials, floor adhesive, vinyl floor tiles, pipe insulation, other asbestos/arsenic/ lead materials be disturbed?

(If **YES** stop work and contact your PM or site EHS for further direction)

☐ Yes ☐ No

Instructions: ● Conduct a walk-through of work area inspecting for hazards. ● Write the steps of the task and list materials needed. ● Note possible hazards involved in each step. ● In the "Method to Eliminate Hazards" column, provide the corrective actions that will be taken to mitigate the hazards.

Sequence of Basic Job Steps & Materials	Identified Hazards Involved in Completing the Steps.	Method to Eliminate Hazards

TEAM MEMBERS:

Print Name	Signature	Print Name	Signature

HOUSEKEEPING: Ladders, Tools, Material stowed safely, not blocking egress, showers, electrical panels. Excesses debris, material, scraps, labels, disposed of and transported to appropriate receptacles. No material stored in racks, wire trays, on/around process equipment. Area swept and cleaned at end of task or work day. Signage/labels correct and updated with correct contact info.
Foreman/Supervisor/Crew Signature:

_____

Time: _____

Foreman/Supervisor Signature:_____

Safety Rep Signature:_____

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Jack Moore Associates, Inc.
Prime Drilling, Sawing, and Anchoring div.
3.1 Hazard Assessment Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 25, 2021

3.1.1 Program Objective:

It is our objective to design and implement Hazard Assessment Program, to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to falls, fire, electric shock, being struck by or caught between in the workplace. It is not only our goal to prevent incidents, but to eliminate any existing or potential hazards by means of training employees to identify hazards and participate in the correction of these hazards, by means of using the Job Hazard Analysis form.

At regular intervals, as prescribed by the program, there shall be a walkthrough of the premises and a thorough examination of work areas which may present certain hazards. All affected employees and sub-contractors shall participate in the examination. A checklist of specific hazards shall be used, identified as the Pre—Task Form any potential hazards not addressed in past inspections. Immediate action shall be taken to correct any existing or potential hazards which may be present. In the event any hazard cannot be eliminated, affected employees shall be made aware of these hazards and trained to avoid accidents or exposure to these hazards. If the hazards cannot be controlled by engineering controls or administrative controls, each affected employee shall be instructed to use personal protective equipment, personal fall arrest systems, or other devices to ensure the safety of the employee.

3.1.2.1 Pre–Task Planning Form

Hazards may be real or potential, and may be of, but not limited to those types listed within this log. The Pre-Task Planning Form shall be used for routine and non-routine activities, new processes, and any changes in job description as well as changes to types of products, equipment, or services used. Process Safety Management is designed to prevent or minimize the results of releases of hazardous, flammable, explosive or toxic chemicals that may be in the workplace.

Hazardous conditions to look for:

Ladders, tools and materials shall be safely stored, not blocking aisles or electrical panels. Pre-plan the job to allow for prompt removal of trash and construction debris. Trash and recyclables shall be placed in appropriate containers and removed from the site on a

regular schedule. Materials should be recycled whenever possible. Work areas shall be swept up at the end of each day.

Look for machinery or tools missing guards or ground prongs. Equipment which may not be operating properly. Materials left in aisles or walkways posing slip and/or trip hazards. Open sided work areas over six feet from lower level. Combustible or flammable materials improperly stored. Mislabeled, or worse, unlabeled secondary containers. General housekeeping. Wood or pallets with exposed nails. Pallet strapping with exposed sharp edges. Work areas, walkways, stairways or ramps with poor illumination. Proper access equipment for various levels (stairs or ladders). Damaged ladders. Ladders missing labels. Excessive noise levels. Materials which may allow hazardous or flammable vapors to build accumulate. Bonding wires with safety cans.

Performance of hazard assessment shall be confirmed by signature of the supervisor responsible for the assessment.

3.1.2.2 General Housekeeping

Non-hazardous waste from the site shall be removed daily and placed in the trash dumpster provided at the site. Scrap materials may or may not be suitable for recycling. If unable to recycle, these materials shall be regarded as trash and disposed of in the dumpster. Recyclable materials shall be stored in an appropriate manner in the designated area for that site. Training shall be provided so employees can determine the difference between general waste, recyclable waste, and hazardous waste.

Waste that may be deemed hazardous waste shall be evaluated by the supervisor on site. Only those employees specifically trained to dispose of hazardous waste will be allowed to handle that waste. For example: concrete slurry must be disposed of carefully to prevent contaminated liquid from entering storm drains. We use products specifically designed to absorb the water from the slurry and it is discarded as solid waste and or reprocessed.

Pre-Task Planning Work Sheet

(To be completed for all tasks.)

Task Plan Author		**Telephone #**		**Pager #**	
Organization		**Start Date**		**Finish Date**	
Location- Build/Floor		**Column**		**Equipment Affected**	
Task to be Performed					

Important!

All contractors must have attended Contractor Safety Orientation prior to starting task.
Locations of EXIT doors and Emergency Equipment must be communicated to all workers prior to starting work. Location must be listed at the bottom of the PTP.
All workers must review, understand, and sign the task plan prior to posting in the work area and starting work.
MSDS' must be available in the work area for all chemicals used.

Any questions with a "Yes" answer must be mitigated by appropriate action or permits in the Task Plan	**Yes**	**No**
Are shop drawings, panel schedules, as-builts or utility scans needed to complete this task?	☐	☐
Does the Area Supervisor need to be notified of the work to be done?	☐	☐
Does the task need to be coordinated with other crafts in lower level as a result of overhead work in the area?	☐	☐
Does this task require entry to a Confined Space, special training or licenses? (Respirator, Confined Space, Forklift, Excavation, Crane, etc.)	☐	☐
Is any additional Emergency Equipment needed to complete this task safely? (Extinguisher, portable eyewash/shower, radios/phones, etc.)	☐	☐
Will any work be performed under raised floor tiles? (If **YES**, see Pre-Entry Checklist)	☐	☐
Will any workers be required to work at heights above 6 feet, including above or outside guard rails? (If **YES**, Fall Protection required)	☐	☐
Will lift equipment or mobile elevated work platforms (MEWPs) be used? (If **YES**, see MEWP checklist)	☐	☐
Will task involve changing flow of vehicle/pedestrian traffic? If yes, complete an exit re-route plan & review w/EHS.	☐	☐
Will task involve the use of an inert gas (nitrogen, argon, helium) that may cause an O_2 deficiency in the work area? (If **YES**, complete O_2 Deficiency Assessment Worksheet).	☐	☐
Will task require working on live systems or equipment requiring LO/TO? (Mechanical, electrical, chemical etc.)	☐	☐
Will the task create any ***risk*** of interruption to manufacturing: (If **YES**, complete MIR).	☐	☐
Will the task create hazards to people working above, below, or around the work area? (If **YES**, barricade per site Barricade Spec)	☐	☐
Will the task involve any hot work? If yes, Fire Dept. and permits are required.	☐	☐
Will the task involve the removal or disturbance of roofing materials, floor adhesive, vinyl floor tiles, and/or pipe insulation or any other products that may contain asbestos, arsenic and lead? (If **YES**, **STOP** and contact CC or EHS for further direction).	☐	☐
Will the task produce dust or smoke? (If **YES**, verify smoke detection in area).	☐	☐
Will there be any disturbance of soil on site? If **YES**, all projects disturbing soil must be evaluated by EHS prior to "turning dirt" (e.g. excavation, screening, transporting on site or off site, etc.)	☐	☐
Will this task generate hazardous waste or material?	☐	☐
Will this task impact the operation or effectiveness of any pollution prevention systems (scrubbers, RTO, wastewater treatment systems)?	☐	☐
Will this task produce mist, noise or vibration?	☐	☐
Will this task produce odors? (If **YES**, post Odor Notification Forms in the work area and notify Security prior to starting work).	☐	☐
Will weather or other working conditions affect the safe completion of this task?	☐	☐
Will any work require shutdown or impact to the site Security systems? (i.e. penetrations through walls , roofs, fences, card readers, alarmed doors, CCTV, etc.) If **YES**, complete a Security Pre-Job checklist and review with Security Dept.	☐	☐
Will you need special tools or equipment to perform the task safely? (Scaffolds, lifts, jacks, nets, cranes, etc.). If **YES**, list in PTP	☐	☐

Permits

	☐ **Confined Space**	☐ **Non-Electrical Hot**	☐ **WPILOS**
	☐ Dirty Work	☐ SIPP	☐ Other:
	☐ EEW	☐ SMS Utility Permit	
	☐ Flush/Discharge	☐ Yellow Card	
Forms			
	☐ Barrier Tape Owner	☐ Odor Notification	☐ MSDS
	☐ Chem. Use Approval	☐ O_2 Deficiency	☐ Security Request
	☐ Critical Lift Plan	☐ Mfg. Interrupt Request	☐ Other:
Checklists			
	☐ MEWP	☐ Raised Floor Pre-Entry	☐ H_2O Mgmt. Checklist
	☐ Trenching/Excavation	☐ Other:	
Personal Protective Equipment			
	☐ Eye & Face Protection	☐ Hand Protection	☐ Hearing Protection
	☐ Fall Protection	☐ Head Protection	☐ Respiratory Protection
	☐ Foot Protection	☐ Other:	

ERGONOMICS' RISK FACTOR ASSESSMENT	**Yes**	**No**
Should material handling equipment be used to move/lift materials (i.e. forklift, pallet jack, chain fall)?	☐	☐
If no lifting equipment is utilized are you aware of and able to practice safe lifting techniques?	☐	☐
Are the materials or equipment to be handled awkward or large? If yes are provisions for possible two person or mechanical assist available.	☐	☐
Does your task involve any ergonomic risk factors listed below? If yes, identify appropriate measures to be taken.	☐	☐

	Y	**N**	**Comments/Actions:**	**Awkward Postures :**	**Y**	**N**	**Comments/Actions:**
High Hand Force	☐	☐		**Shoulders**	☐	☐	
Vibration	☐	☐		**Neck**	☐	☐	
Repeated Impacts	☐	☐		**Back**	☐	☐	
Repetitive Motion	☐	☐		**Knees**	☐	☐	
Static Postures	☐	☐		**Arms**	☐	☐	

Location of Nearest Emergency Shower/Eyewash	**Column**	

3.1.3 Job Hazard Analysis (JHA) and Working Alone

On the following page, you will find an example of the Jack Moore Associates/Prime Drilling Services Job Hazard Analysis. It is important to note that in the event any one of the Potential Hazards listed in column two (2) has a rating of (2) Moderate Hazard, or (3) High Hazard, an employee is prohibited from working alone. Examples of High Hazards are working at height, working with utilities embedded in the substrate, or the presence of utilities on the opposite side of the substrate. Two employees or one employee and a client representative must be present at all times.

3.1.4 Low hazard Working Alone

A JHA must be filled out in advance to determine what hazards might be present under current conditions or if conditions change. When working alone, the employee must carry a cell phone, push-to-talk device, or other means of back-up communication with the supervisor, the office, or a client representative, in case of emergency.

Before work begins, the employee shall contact the supervisor, office, or the client representative as a "check-in" procedure. If the task takes more than one hour to complete, the employee shall make contact each hour during the work process. The

check-in and subsequent contact shall maintain a log which includes the time of check-in, the time of each subsequent contact and the time of check-out, as well as the condition of the employee at the time.

If contact is not made within the hour, it is the responsibility of the check-in contact to call the employee or investigate further to assure the safety and well-being of the employee.

If there is no response from the employee, the contact shall call 911, local authorities, or an in-house emergency response team if available. The main office of Jack Moore Associates shall be contacted immediately after having emergency response in place.

Refer to the Site-Specific Safety Plan for local contact information, poison control center, nearest hospital or healthcare facility.

Job Hazard Analysis

Lists all Tasks to be performed. Identify hazard by level of severity:
(1) Low Hazard, (2) Moderate Hazard, (3) High Hazard

Steps To Take To Complete Task	Potential Hazard(s) Associated with Step	Required Action(s) To Eliminate Or Control The Hazard	Competent Person or Person(s) Responsible for Action	✓
Concrete cutting Core Drilling	Eye injuries (2)	Wear safety glasses	Prime operator	
	Hand injuries (2)	Wear appropriate gloves for conditions	Prime operator	
	Head injuries (2)	Wear approved head protection	Prime operator	
	Falls (3)	Use appropriate fall arrest or fall restraint system for conditions	Prime operator, supervisor	
	Personal Protective Equipment failure (2)	Inspect PPE each time it is worn	Prime operator	
	Utilities on opposite side (3)	Inspect underside of slab or opposite side of wall before cutting or drilling. Drill pilot hole	Prime operator, supervisor	
	Embedded utilities (3)	Secure as-builts or have area to be cut scanned	Client	

	Back strain (2)	Do not lift items heavier than 50 pounds alone. Get assistance.	Prime operator	
	Slips, trips, falls. (2)	Practice good housekeeping practices. Vacuum up slurry.	Prime operator	
	Tool failure (1)	Inspect equipment regularly, have backup equipment available.	Prime operator	
	Other trades in work area (2)	Coordinate work with other trades, GC or client.	Prime operator, supervisor	

This Job Hazard Analysis must be reviewed by the foreman/supervisor and signed by all workers involved prior to starting any work.
(My signature verifies I have reviewed the JHA and agree to work to the plan).

Worker Supervisor		Date:	
Worker Signature		Date:	
Worker Signature		Date:	
Worker Signature		Date:	
Worker Signature		Date:	

Assessment performed by:

_____
Signature

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3.2
The Alcohol and Substance Abuse Policy
For Jack Moore Associates, Inc.

3.2.1 Purpose and Goal

Jack Moore Associates is committed to protecting the safety, health and well-being of all employees, customers, suppliers, other contractors and all other individuals in our workplace.
We recognize that alcohol abuse and drug use pose a significant threat to our goals. We have
established a drug-free workplace program that balances our respect for individuals with the need to maintain an alcohol and drug-free environment.

This policy requires that all employees be physically capable of performing their assignments in a safe manner

This policy recognizes that employee involvement with alcohol and other drugs can be very disruptive, adversely affect the quality of work and performance of employees, pose serious
health risks to users and others and have a negative impact on productivity and morale.

This company has no intention of interfering with the private lives of its employees unless involvement with alcohol and other drugs off the job affects job performance or public safety. As a condition of employment, this company requires that employees adhere to strict policy regarding the use and possession of drugs and alcohol.

Employees are responsible for notifying their immediate supervisor if for any reason, they feel fatigued or otherwise incapable of performing their tasks.

This company encourages employees to voluntarily seek help with drug and alcohol
problems.

3.2.2 Covered Workers

Any individual who conducts business for the company, is applying for a position or is conducting business on the company's property is covered by our drug-free workplace policy.
Our policy includes, but is not limited to all regular and temporary full and part time employees.

3.2.3 Applicability

Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for the company. Therefore, this policy applies during all working hours,
whenever conducting business or representing the company, while on call, paid standby, while using company vehicles, and while on company property.

3.2.4 Prohibited Behavior

It is a violation of our drug-free workplace policy to use, possess, sell, trade and/or offer alcohol, illegal drugs or intoxicants.

Prescription and over the counter drugs are not prohibited when taken in standard dosage and/or according to a physician's prescription. Any employee taking prescribed or over-the-counter medications will be responsible for consulting the prescribing physician and/or pharmacist to ascertain whether the medication may interfere with safe performance of his/her job. If the use of a medication could compromise the safety of the employee, fellow employees or the public, it is the employee's responsibility to use appropriate personnel procedures (e.g., call in sick, use leave, request change of duty, notify supervisor) to avoid unsafe workplace practices.

The illegal or unauthorized use of prescription drugs is prohibited. It is a violation of our drug- free workplace policy to intentionally misuse and/or abuse prescription medications. Appropriate disciplinary action will be taken if job performance deterioration and/or other accidents occur.

3.2.5 Notification of Convictions

Any employee who is convicted of a criminal drug violation in the workplace must notify the company in writing within five calendar days of the conviction. The company will take appropriate action within 30 days of notification. Federal contracting agencies will be notified when appropriate.

3.2.6 Searches

The company reserves the right to search company vehicles, property or premises. Premises include work sites. In the event that any kind of search becomes necessary, it will be conducted with respect, and with utmost consideration for the employee's privacy.

3.2.7 Testing

Employees may be required to submit to drug and alcohol screening as a condition of employment. An employee may be requested by the company to participate in drug testing upon the requirement of an awarding authority, primary contractor, or owner. If

medical test shows the presence of illegal drugs, the employee will be subject to the consequences set forth by the party requesting the test. Jack Moore Associates, Inc. will make every possible effort to preserve and to protect the privacy of the employee by treating all such test results as highly confidential, and by limiting to the absolute minimum those who are made aware of the results.

Supervisors who observe unusual behavior or actions have full authority to ask the employee to leave the jobsite. Appropriate investigation and action will be taken.

3.2.8 Consequences

One of the goals of our drug-free workplace program is to encourage employees to voluntarily seek help with alcohol and/or drug problems. If, however, an individual violates the policy, the consequences are serious. Employees may be monitored. Suspicious activities or behavior may require removal from the worksite and subsequent drug screening.

In the case of applicants, if he or she violates the drug-free workplace policy, the offer of employment can be withdrawn. The applicant may not reapply.

If an employee violates the policy, he or she will be subject to progressive disciplinary action and may be required to enter rehabilitation. An employee required to enter rehabilitation who fails to successfully complete it and/or repeatedly violates the policy will be terminated from employment. Nothing in this policy prohibits the employee from being disciplined or discharged for other violations and/or performance problems.

3.2.9 Return-to-Work-Agreements

Following a violation of the drug-free workplace policy, an employee may be offered an opportunity to participate in rehabilitation. In such cases, the employee must sigh and abide by the terms set forth in a Return-to-Work-Agreement as a condition of continued employment.

3.2.10 Assistance

Jack Moore Associates, Inc. recognizes that alcohol and drug abuse and addiction are treatable illnesses. We also realize that early intervention and support improve the success of rehabilitation. To support our employees, our drug-free workplace policy:

Encourages employees to seek help if they are concerned that they or their family members may have a drug and/or alcohol problem.

Allows the use of accrued paid leave while seeking treatment for alcohol and other drug problems.

May grant an unpaid leave of absence in order to seek treatment for alcohol and other drug problems.

Treatment for alcoholism and/or other drug use disorders may be covered by the employee benefit plan. However, the ultimate financial responsibility for recommended treatment belongs
to the employee.

3.2.11 Confidentiality

All information received by the company through drug-free workplace program is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws and management policies

3.2.12 Shared Responsibility

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play.

All employees are required to not report to work or be subject to duty while their ability to perform job duties is impaired due to on- or off-duty use of alcohol or other drugs. In addition, employees are encouraged to:

Be concerned about working in a safe environment.
Support fellow workers in seeking help.
Report dangerous behavior to the supervisor or the president.

It is the supervisor's responsibility to:

Investigate reports of dangerous practices and report them to the president.
Remind employees of the drug-free workplace policy.

3.2.13 Communication

Communicating our drug-free workplace policy to both supervisors and employees is critical to
our success. To ensure all employees are aware of their role in supporting our drug-free workplace program:

All employees will receive a written copy of the policy
The policy will be reviewed in orientation sessions with new employees
All employees will receive an update of the policy annually.

ACKNOWLEDGEMENT OF RECEIPT
JACK MOORE ASSOCIATES, INC.
ALCOHOL AND SUBSTANCE ABUSE POLICY

I acknowledge that I have read and understand the Alcohol and Substance Abuse Policy.

NAME (Print)_____

Signature_____

Date_____

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3.3 Drug-Free Workplace Policy

3.3.1 Purpose and Goal

Jack Moore Associates, Inc. is committed to protecting the safety, health and well-being of all employees and other individuals in our workplace. We recognize that alcohol abuse and drug use pose a significant threat to our goals. We have established a drug-free workplace program that balances our respect for individuals with the need to maintain an alcohol and drug-free environment.

- This organization encourages employees to voluntarily seek help with drug and alcohol problems.

3.3.2 Covered Workers

Any individual who conducts business for the organization, is applying for a position or is conducting business on the organization's property is covered by our drug-free workplace policy. Our policy includes, but is not limited to CEO, executive management, managers, supervisors, full-time employees, part-time employees, off-site employees and contractors.

3.3.3 Applicability

Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for the organization. Therefore, this policy applies during all working hours, whenever conducting business or representing the organization, while on call, paid standby and while on organization property.

3.3.4 Prohibited Behavior

It is a violation of our drug-free workplace policy to use, possess, sell, trade, and/or offer for sale alcohol, illegal drugs or intoxicants.

3.3.5 Notification of Convictions

Any employee who is convicted of a criminal drug violation in the workplace must notify the organization in writing within five calendar days of the conviction. The organization will take appropriate action within 30 days of notification. Federal contracting agencies will be notified when appropriate.

3.3.6 Drug Testing

To ensure the accuracy and fairness of our testing program, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (SAMHSA) guidelines where applicable and will include a screening test; a confirmation test; the opportunity for a split sample; review by a Medical Review Officer, including the opportunity for employees who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result; and a documented chain of custody.

All drug-testing information will be maintained in separate confidential records.

Each employee, as a condition of employment, will be required to participate in pre-employment, random, reasonable suspicion, in case of an incident, and return-to-duty testing upon selection or request of management.

The substances that will be tested for are: Amphetamines, Cannabinoids (THC), Cocaine, Opiates, Phencyclidine (PCP) and Alcohol.

Testing for the presence of alcohol will be conducted by analysis of saliva.

Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine.

Any employee who tests positive will be prohibited from working on any Client/Host site or facility, suspended without pay for a period of 30 days, referred to a substance abuse professional for assessment and recommendations and required to pass a Return-to-Duty test and sign a Return-to-Work Agreement.

An employee will be subject to the same consequences of a positive test if he/she refuses the screening or the test, adulterates or dilutes the specimen, substitutes the specimen with that from another person or sends an imposter, will not sign the required forms or refuses to cooperate in the testing process in such a way that prevents completion of the test.

3.3.7 Consequences

One of the goals of our drug-free workplace program is to encourage employees to voluntarily seek help with alcohol and/or drug problems. If, however, an individual violates the policy, the consequences are serious.

In the case of applicants, if he or she violates the drug-free workplace policy, the offer of employment can be withdrawn. The applicant may reapply after six months and must successfully pass a pre-employment drug test.

If an employee violates the policy, he or she will be subject to progressive disciplinary action and may be required to enter rehabilitation. An employee required to enter rehabilitation who fails to successfully complete it and/or repeatedly violates the policy

will be terminated from employment. Nothing in this policy prohibits the employee from being disciplined or discharged for other violations and/or performance problems.

3.3.8 Return-to-Work Agreements

Following a violation of the drug-free workplace policy, an employee may be offered an opportunity to participate in rehabilitation. In such cases, the employee must sign and abide by the terms set forth in a Return-to-Work Agreement as a condition of continued employment.

3.3.9 Assistance

Jack Moore Associates, Inc. recognizes that alcohol and drug abuse and addiction are treatable illnesses. We also realize that early intervention and support improve the success of rehabilitation. To support our employees, our drug-free workplace policy:

- Encourages employees to seek help if they are concerned that they or their family members may have a drug and/or alcohol problem.

Treatment for alcoholism and/or other drug use disorders may be covered by the employee benefit plan. However, the ultimate financial responsibility for recommended treatment belongs to the employee.

3.3.10 Confidentiality

All information received by the organization through the drug-free workplace program is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws and management policies.

3.3.11 Shared Responsibility

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play.

All employees are required to not report to work or be subject to duty while their ability to perform job duties is impaired due to on- or off-duty use of alcohol or other drugs.

In addition, employees are encouraged to:

- Be concerned about working in a safe environment.
- Support fellow workers in seeking help.
- Report dangerous behavior to their supervisor.

It is the supervisor's responsibility to:

- Inform employees of the drug-free workplace policy.
- Observe employee performance.
- Counsel employees as to expected performance improvement.

- Clearly state consequences of policy violations.

3.3.12 Communication

Communicating our drug-free workplace policy to both supervisors and employees is critical to our success. To ensure all employees are aware of their role in supporting our drug-free workplace program:

- All employees will receive a written copy of the policy.
- The policy will be reviewed in orientation sessions with new employees.

3.4 Housekeeping

Initiative: Work Safe and Clean

3.4.1 Program Objective:

It is most important to understand the clients objective when working in clean room environments. The two major aspects of working in a clean room are **Cleanliness and Schedule.**

3.4.2 Cleanliness

Cleanliness is important while cutting concrete in hospitals, manufacturing facilities, and other occupied buildings. In a clean room manufacturing facility it is far more serious. The smallest bit of contaminant whether it be dirt, human hair, spittle, or bacteria can seriously impact the product being manufactured. Sometimes the contaminants get trapped in the product during manufacturing and do not show up for a long time after. The worst situation is a failure from contaminants that occurs after the product has been installed at the customer of the manufacturer. This can cause devastating chain reactions to other components of the device and cause high repair costs and down times. To operate in a super clean environment, you have to overcome a psychological trap. "Why do I have to clean that when it already looks clean?". That's the trap, it LOOKS clean. The contaminants we speak of above are not visible to the human eye, yet they cause the most damage. Therefor never compromise a cleaning procedure with shortcuts.

3.4.3 Schedule

The schedule in the building stage and tool fit up stage is limited by the performance of sub-contractor trades. This means if you perform, the client performs. You must perform in a manner that is not normal to most jobsites. When in a clean room manufacturing facility, there is much more danger, more pressure, and more expectations of you to perform beyond normal jobsite conditions. Observing the schedule of the manufacturer or construction manager is of major importance, however you should never compromise cleanliness or safety to meet the demanding schedule. If you foresee problems, contact your supervisor so that he/she can make the appropriate decisions to maintain schedule, cleanliness, and safety.

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3.4.4 Clean Room Operations

1) The client depends on your organization skills, cleanliness, and ability to overcome obstacles. It is the schedule of the client, which drives the project, not your personal agenda. Any violation of cleanliness, safety, or chronic absenteeism will result in your removal from the site. The clients safe work practices shall be adhered to at all times. Requirements may include confined space entry by properly trained personnel only, observing lock-out/tag-out procedures, opening process equipment or piping, and restricted access to the facility or certain areas of the facility. In the event that our operations create any hazardous conditions, the client shall be advised of these conditions at once.

2) Our client's objective is to meet deadlines in their market. It is our objective to meet their deadlines.

Procedures

1) Equipment Transportation

a) Equipment, new or used shall be wiped and shrink wrapped prior to entering vehicles before transport to clean room facilities.

b) Upon arrival at site equipment shall be unloaded in proper fashion as not to tear protective wrapping.

c) Equipment is then moved to pre-washing area.

d) Once personnel is in proper garments, washing of equipment occurs prior to entering the clean zone.

2) Personnel working in a clean room environment must follow the following guidelines:

a) Identify the class clean room you are to be working in.

b) Observe all protocol and safety set forth by the client and or construction manager.

c) Make sure all permits are signed. Keep all permits posted at your work area. **Never proceed with work on verbal authorizations. If you do not have the permits to do the described work, do not perform the work.**

d) Permits might include, but are not limited to the following:

1) Confined Space
2) Working at heights above six feet.
3) Odor Alerts.
4) Hot Work.

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3.5 Accident and Incident Investigation Procedure

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

3.5.1 All accidents, incidents, and near misses must be reported to the immediate supervisor and the main office as soon as possible and always on the same day as the incident occurred. Reporting of an incident must also be reported to the following if applicable:

The office of the host facility according to their requirements.
Any work-related fatality to OSHA within 8 hours.
Any work-related in-patient hospitalization, amputation, or loss of an eye to OSHA within 24 hours.

3.5.2 All accidents, incidents, and near misses will be investigated to determine the cause. The depth of the investigation will be based on an evaluation of the severity of the incident. The Jack Moore Associates safety manager, or an assistant is responsible for performing the investigation. They may request additional employees who were present or other witnesses to assist in the investigation. Witnesses may be interviewed, and statements collected. Such information will be held as evidence in a secure and confidential manner.

3.5.3 Lead persons are trained in the accident/ incident investigation procedures.

3.5.3.1. Assemble an investigation team including the safety program manager, project supervisor and one or more employees familiar with the job site and or type of work being done when the accident/incident occurred. The team will be equipped with all necessary equipment to aid in the investigation, including, but not limited to, digital camera and voice recorder.

3.5.3.2. Gather information. The investigation team learns the facts about the accident/incident from the injured employee, witnesses and others involved.

3.5.3.3. Analyze the information. The team identifies causes and other contributing factors and determines how the accident/incident could have been prevented.

3.5.3.4. Report findings. The team completes an accident/incident report, describing who was involved, when and where it occurred, and what caused the accident/incident. The report also includes the team's recommendations on how to prevent a reoccurrence.

3.5.3.5. Act on recommendations. Management reviews the report and determines how to prevent the accident/incident from happening again.

3.5.3.6. Follow up. The safety committee and/or investigation team ensures that appropriate corrective action is taken, preserves the evidence and all evidence is held as confidential.

3.6 Stop Work Authority

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

3.6.1 The Stop Work Authority (SWA) program is designed to provide employees and contract workers with the responsibility and obligation to stop work when a perceived unsafe condition or behavior may result in an unwanted event.

Supervisors, employees, and contractors are authorized and encouraged to initiate a SWA when conditions or behaviors threaten danger or imminent danger to any person, equipment, or the environment. Situations that warrant a SWA may include, but are not limited to:

Alarms.
A change in conditions.
Unsafe conditions.
Any change to the scope of the work or work plan.
Any emergency situation.
Improper use of equipmen.t
A near miss.
Evidence of lack of proper training or lack of knowledge.

Employees and contractors shall initiate the SWA, in good faith, without fear of retribution. All employees and contractors have the support of managers and supervisors of Jack Moore Associates, Inc. and Prime Drilling and Sawing Services. Employees and contractors shall recognize, respect, and support the SWA initiated by others.

3.6.2 SWA Procedure:

3.6.2.1 Stop Work

When an employee or contractor perceives a condition or behavior that may pose an imminent danger to any person, equipment, or the environment, they must immediately intervene and initiate the SWA with the person or persons at risk.

If the supervisor is readily available and there is a danger other than imminent danger, the employee or contractor shall coordinate the SWA with the supervisor.

3.6.2.2 Notify

Notify all affected employees, contractors, and supervisors of the SWA. If necessary, activities associated with the work that was stopped may also require a SWA. Make the area as safe as possible. Have unnecessary personnel leave the area and stabilize the situation.

3.6.2.3 Investigate

Open a discussion between all affected parties and come to an agreement on the SWA. If the condition or behavior is deemed not to be dangerous and it is safe to continue work without modifications, the SWA is complete and no further action is needed.

If all affected parties agree the SWA is valid, A Stop Work Issuance Form is completed. All safety issues and conditions resulting in the Stop Work Issuance Form, must be corrected before work can resume.

3.6.2.4 Correct

Modifications or work practice changes shall be made according to the corrective measures found on the Stop Work Issuance Form. The Competent person, Safety manager, and Supervisor shall then inspect and evaluate to determine that the corrective measures have been completed. Their findings shall be noted on the form.

3.6.2.5 Resume

The area(s) affected by the SWA shall be reopened for work. All affected employees shall be notified of the corrective measures taken and informed of conditions to avoid in the future.

In the event that an employee still feels conditions are not safe, they shall be assigned to different duties without retribution.

3.6.2.6 Follow up

Operations manager(s) will provide the root cause analysis to the SWA and identify possible work practice improvements. The safety manager will inform all managers, employees, and contractors and outline the reason for the SWA, the corrective action(s) taken, and the lesson(s) learned. Management will review the SWA reports and identify if any further follow up is needed.

3.6.3 Training

The importance of training and ongoing training cannot be underestimated. It is essential that all personnel understand how the SWA program works in order to be successful.
Tracking SWA occurrences helps with the evaluation of the effectiveness of the program and identifies areas for improvement.

3.6.4 Retribution

Personnel must not feel apprehensive to act on their obligation to initiate a SWA. All personnel must understand that there will be no retribution for their good faith action, even if it is found to be unnecessary.

3.6.5 Regulatory Requirements

As of the date of this document, there are no regulations requiring adoption of this practice. However, it is encouraged in OSHA's Voluntary Protection Program. It has been recognized as a necessary element of safety programs of the **United States Department of Energy and The United States Nuclear Regulatory Commission.**

Section 1: Stop Work Issuance			
Work Order No.		Job Name	
Location		Date / time	
Supervisor		Phone	
Individual initiating stop work			
Individual performing work			
Work operation or condition (include names of individuals performing work)			
Hazard (as stated by individual initiating stop work)			
Additional observations			

Section 2: Date / Time Informed			
Supervisor		Safety Manager or Assistant	
Date / Time informed			
Comments			

Section 3: Follow-up Action – Corrective Measures to be taken.

Section 4: Restart Concurrence			
Supervisor		Date	
Safety Manager or Assistant		Date	
SWA Initiator		Date	
Section 5: Restart Authorization			
Date		Time	
Signature			
Safety Manager or Assistant		Date	

3.7 OSHA Inspections

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

3.7.1 Program Objective:

To ensure that a compliance officer receives a cordial reception and is presented with any documents that may be requested.

3.7.2 Preparation

Preparing for an inspection has several benefits. It allows the facility professional to be in control of the event, creates a positive impression on the inspector, and may result in fewer violations. Anticipate the following items:

Members from management should escort the inspector during the visit. Also a company photographer should accompany the compliance officer throughout the inspection and representative to control the passage of documents during the inspection.

Likely areas of Concerns:

Training and documentation for housekeeping.
Compliance with regulations, especially new requirements:
- Hazard Communications, GHS, and SDS.
- Confined Space training.

Injury/Illness records for the past five years
Hazard Communication, lockout tagout, and respirator programs
Emergency preparedness and evacuation procedures
Access provisions for exposure and medical records
Posting Requirements

3.7.3 Documentation

Documents should only be provided when specifically requested. The document controller should be the only person to present the requested material, which should be logged. Unsolicited material stays out of sight. Anything an inspector notices can be used against the company.

3.7.4 Employee Interviews

Employees should be prepared to answer questions truthfully; however, they should not volunteer information. Questions should be answered specifically as they are asked in order to keep the inspection focused. No one should speculate if they are not sure of an answer. They should state, “I’ll check the facts and get back to you”. Any employee has the right to refuse to speak to an inspector, request that management be present, or speak to an inspector in private. An impromptu interview should not last more than 10 minutes.

3.7.5 When the inspector shows up

The inspector should be greeted cordially and directed to a specific place. This will prevent strolling around the premises. The inspection team should be notified of the inspector's arrival. If management is not available, the inspector should be asked to reschedule the visit.

3.7.6 Things to Do

Request credentials call the office for verification and make copies of the credentials.

Find out the purpose of the inspection. Why is the inspector visiting? Is it due to an employee complaint or is it a programmed inspection?

Determine the scope of the inspection. If it is due to a complaint, facility professionals can ask for a copy of the complaint and negotiate the scope of the inspection, which should only address the specific complaint or question.

A wall to wall inspection is usually required when all four of these triggering criteria are met.

An employee complaint is received.
The business is in a high injury rate industry.
The employer has a lost workday rate above the national average.
OSHA has not carried out a complete safety inspection during the last two years.

3.7.7 The Closing Conference

At the end of the inspection, the company will benefit from and insist on a closing conference with the OSHA representative. This is an ideal time to ask the inspector to specify citations that will probably be issued and find out how the violations will be characterized. However, it is not time to make abatement date promises or consider the issue closed.

In the aftermath of an inspection, the team should review the results and correct any deficiencies noted by the inspector. If errors are found, the company should respond with a follow up letter to the inspector addressing any concerns.

If deficiencies are noted that the inspector did not appear to see, the team should correct those as well. Internal notes should be made so there is a record of when and how deficiencies have been addressed and corrected.

OSHA is authorized to impose civil and criminal penalties on employers who violate its standards and regulations.

Jack Moore Associates, Inc.
Prime Drilling, Sawing, and Anchoring div.
4.1 Hazard Communication Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

4.1.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to chemicals which may be used in our workplace. It is our goal to provide full information and training to each employee in order to assure the safest possible working conditions.

4.1.2 Program Management:

The Jack Moore Associates, Inc. Hazard Communication Program shall be managed by Peter E. Michaud, who shall be responsible for:

(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(f) Providing training for materials used in other than routine operations.
(g) File appropriate reports with respective governmental authorities.
(h) Handle all requests for Safety Data Sheets (SDS) formerly referred to as Material Safety Data Sheets (MSDS) and chemical listings on a timely basis.

4.1.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Hazard Communication Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant/ jobsite operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

4.1.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc. These should be submitted in writing to the Program Manager who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

4.1.5 Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be at the work place in the vehicle or if possible in the job box which is closest to the actual work. This written plan shall also be posted near the **"Right to Understand"** station in each branch, and all employees shall be notified of its location.

4.1.6 Hazardous Materials Locations:

A complete listing of all hazardous materials known to be present in the workplace shall be made available at all times for review by all employees. This list shall be kept at the workplace, in the vehicles, or in the job box which is closest to the actual work. These materials must have proper labeling on all containers and corresponding Safety Data Sheets have been made available at the **"Right to Understand"** station in each branch. SDS shall also be available at individual work areas where applicable.

Site specific material lists shall be provided as necessary and when multi-employer sites occur, a site-specific list will be provided to the other affected employees. In addition, the supervisor on a multi-employer site, shall be required to acquire SDS for hazardous materials being used by other employers on site. This information shall be distributed to all JMA/Prime employees and site-specific training shall be conducted where applicable.

4.1.7 Hazardous Chemical List:

Common Name	Chemical Name.	Dept. / Area
Graymill's Agitene	Aliphatic Petroleum Distillate	Service Dept., Worcester
Methanol	Methanol / Alcohol	Prime Div., Storage Area
	Given as examples complete list is posted at the "Right To Understand" station in each branch.	

4.1.8 Globally Harmonized System (GHS) of Classification and Labeling of Chemicals

As of November 20, 2013, each affected and unaffected employee has received the prescribed training on the Globally Harmonized System (GHS) of Classification and Labeling of Chemicals.

Employees are capable of recognizing and understanding the requirements of the GHS label system and GHS pictograms as follows:

Label requirements:

- Product identifier
- Supplier identification
- Signal word
- Precautionary statements
- Hazard statements
- Pictograms
- Supplemental information

4.1.9 Safety Data Sheet (SDS) format

Employees are capable of recognizing and understanding the requirements of the new Safety Data Sheet format and the 16 sections.

The “Right to Understand” information station has been updated with any available SDS sheets. At this time, not all manufacturers are compliant with the new format. The information shall be updated as the new SDS forms become available and is complete to the best of our ability as of June 1, 2015.

Hazardous Chemical List: (Representative: there may be additions for site specific applications)

Common Name	Chemical Name.	Dept. / Area
Congelz	Sodium polyacrylate and mineral blend	Warehouse and on site
Quik-Set FIPS C1	Composite Resin Anchoring System	Warehouse and on site
Gasoline	Gasoline, unleaded	Warehouse and on site
Diesel fuel	Diesel fuel	Warehouse and on site
Propane	Propane	Warehouse and on site
Starting Fluid	Starting Fluid	Warehouse and on site
Upside Down Paint, Orange	Marking Paint	Warehouse and on site
Upside Down Paint, White	Marking Paint	Warehouse and on site
Upside Down Paint, Clear	Marking Paint	Warehouse and on site
WD-40 Aerosol	WD-40	Warehouse and on site

4.2 Asbestos Safety Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

4.2.1 Program Objective:
To keep our employees aware of the dangers associated with asbestos. To provide employees with guidelines to protect them from exposure to airborne asbestos.

4.2.2 Program Management:

The Jack Moore Associates, Inc. Asbestos Safety Program shall be managed by Peter E. Michaud who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.

4.2.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Asbestos Safety Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

4.2.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

4.2.5 Asbestos – What is it?

Asbestos is a generic term for a group of minerals known for their strength, flame and heat resistance, and seemingly indestructible qualities.

Once considered a "miracle mineral", asbestos was used for many years in building construction. It can be found in many forms and places. Asbestos was used in boiler and pipe insulation, plasters, floor tile, electrical insulation, and as a fireproofing material on structural members in buildings. It has also been sprayed on ceilings and walls as acoustic insulation.

Because of its indestructible qualities, asbestos is harmful to the human body. The body cannot digest, break down, or change asbestos; it can only attempt to encapsulate it with scar tissue.

Several types of asbestos were banned by the EPA in the mid - 70's due to concern over health effects (especially cancer) associated with exposure to such materials. It is important to remember that asbestos generally been found to be hazardous to humans only when it is inhaled into the lungs.

Asbestos occurs naturally as a fiber; individual fibers are so small they are invisible to the naked eye. Most asbestos is not hazardous in its original, undisturbed state; only when it is disturbed does it release asbestos fibers.

Symptoms of asbestos related diseases do not occur soon after exposure. Those who are sick today because of asbestos may have been exposed 20 – 40 years ago. Controlling exposures now will prevent disease and suffering decades later.

4.2.6 Where is asbestos found?

1. Sprayed on fireproofing
2. Insulation for pipes and boilers
3. Wall and ceiling insulation
4. Ceiling tiles
5. Floor tiles
6. Putties, caulks, and cements (such as chemical carrying cement pipes)
7. Roofing shingles

8. Siding shingles on old residential buildings
9. Wall and ceiling texture in older buildings and homes
10. Joint compound in older buildings and homes
11. Brake linings and clutch pads
12. Electrical fixtures and wiring

Pipe and boiler insulation that contains asbestos will be labeled with identifying stickers and placards.

Asbestos – containing ceiling tiles will not be labeled or marked. These tiles cannot be differentiated from other tiles by visual means – they must be analyzed by a laboratory test.

4.2.7 Protective Measures General

EH&S departments all over are involved in an on-going effort to survey and identify asbestos containing materials across their campuses. If these materials are to be disturbed, through building demolition, building repair or abatement, specific safeguards must be followed to prevent exposures. Signs and labels are also used to demarcate asbestos products and abatement activities.

Work that requires removal or repair of asbestos containing materials or the testing of suspect material is restricted to trained and certified individuals working under direct supervision of various authorities.

4.2.8 Protective Measures – Individuals

Use the following measures to protect you and others from exposure to airborne asbestos:

1. Presume all building materials contain asbestos until proven otherwise by EH&S
2. Do not remove, cut ,drill, sand, grind, or otherwise disturb any material that may contain asbestos.
3. Do not go above ceilings, behind walls or into building spaces such as attic and crawlspaces unless these areas have been inspected and cleared by EH&S.
4. Do not pull cable or wiring through above ceiling spaces with asbestos.
5. Do not install screws, pins, nails or hangers into asbestos ceilings or wall plaster.
6. Be careful not to damage walls, ceilings or floors when moving furniture or equipment.
7. Do not brush, sweep or vacuum textured asbestos ceiling plaster or plaster debris.
8. Never dispose of asbestos containing materials into trash. Handling of asbestos is by trained and certified employees only.

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4.3 Silica Awareness Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 26, 2021

4.3.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to air contaminated with harmful crystalline silica in the workplace. It is our primary objective to prevent atmospheric contamination by enclosure or confinement of the operation, ventilation or wet drilling and cutting operations whenever possible. When effective engineering controls are not feasible, or while they are being instituted, appropriate respirators shall be used.

4.3.2 Program Management:

The Jack Moore Associates, Inc. Silica Awareness Program shall be managed by Peter E. Michaud who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.
7. Handle all requests for Safety Data Sheets (SDS) and chemical listings on a timely basis.

4.3.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the. Jack Moore Associates, Inc. Silica Awareness Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

4.3.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

4.3.5 Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to Know"** station in each branch, and all employees shall be notified of its location.

4.3.6 Planning:

Employees who may be required to perform work duties in a potentially contaminated atmosphere will be issued an appropriate respirator by Jack Moore Associates, Inc. Employees shall be trained in the proper use of this respirator by the program manager or the Assistant Program Managers. This personal protective equipment will be maintained on a daily basis during the period(s) of use. Respirators used in the Jack Moore Associates, Inc. Respiratory Protection Program shall be, but not limited to half or full face masks with appropriate filters or disposable masks conforming to 42 CFR 84. Self-contained or supplied air systems are not included in this program as of February 26, 2021.

4.3.7 What Is Silica?

Crystalline silica (quartz) is a naturally occurring substance found in many types of rocks, sand, and various construction materials. Most commonly in construction, silica can become airborne when dry drilling or cutting concrete or masonry materials. Obviously when airborne particles are present, those particles can be inhaled by employees performing the operation or by employees in the vicinity. Once inhaled, silica stays in the lungs and cannot be expelled. Exposure over time can cause silicosis and other health problems.

4.3.8 What Is Silicosis?

Silicosis is a disease of the lungs caused by inhalation of airborne silica particulates. Silicosis occurs when microscopic particles are inhaled and deposited deeply within the lungs causing fibrosis or scar tissue. This reduces the ability of the lungs to extract oxygen from the air. Smoking actually increases the amount of dust that can enter your lungs. Symptoms are similar to emphysema or asbestosis. Silicosis damages tissues in the lungs making it difficult to breath and the disease is irreversible. Silicosis also increases your risk of lung infections like tuberculosis and lung cancer. Silicosis can also lead to heart failure.

4.3.9 Silica Exposure Hazards.

Silica exposure can occur in various occupations such as dry drilling, cutting and grinding of concrete and masonry materials, jack hammering, concrete mixing and mortar mixing, sandblasting, rock crushing and drilling, mining operations, glass manufacturing and more. Even grinding and cutting metal exposes the employee to silica from abrasive blades which contain silica.

Control the hazard by implementing engineering and work practice controls. Controls such as wet drilling and cutting or the use of HEPA dust collection systems can eliminate the hazard. When such controls are not feasible, respiratory protection must be used. In addition to respiratory protection, other personal protection equipment such as gloves, aprons, and splash goggles should be used to prevent contact with skin and eyes. Be sure to wash hands thoroughly before eating, drinking, or the application of cosmetics. Contaminated clothing should be removed before leaving the jobsite.

4.3.10 OSHA 29 CFR 1926.1153.

Effective June 23, 2017 OSHA has mandated a more stringent "Permissible Exposure Limit" moving from 250 micrograms/m^3 over an 8 hour period (time weighted average) to 50 micrograms/m^3 over an 8 hour period.

OSHA has provided three options for compliance. We have determined that the best option for the work we do is to comply with the requirement of Table 1 under the standard. For example, the use of rig mounted core drills shall be used with water fed to the area of contact between the core bit and the work surface thereby producing slurry and eliminating the danger of producing respirable Silica dust. All equipment shall be used according to manufacturer's instructions.

Other concrete or masonry drilling operations may require the use of commercially available dust containment equipment, such as containment shrouds manufactured for use with rotary hammers and hammer drills, with or without the addition of HEPA vacuum collection equipment.

Before the commencement of any project, these issues shall be evaluated and the appropriate equipment shall be provided for the operation in compliance with Table 1 of OSHA 29 CFR 1926.1153.

Respirators shall be provided as required by the standard. A minimum of APF 10 (Assigned Protection Factor 10) or APF 25 respirators shall be provided without cost to the employee(s) as required by the standard. A minimum of APF 10 shall be disposable NIOSH N95 particulate respirator. APF 25 shall be either half or full facepiece, re-usable PPE with appropriate P100 cartridge or pancake filters. Filters shall be changed on a regular basis according to the number of hours of particulate exposure. A record of the exposure and donning of respirators shall be maintained for each employee, including the

number of hours of exposure, the type of respirator used, and if appropriate the type of filter and frequency of replacement. Respirators shall be used and maintained according to manufacturer's instructions.

Employees who are required to wear disposable, half face or full facepiece respirators shall be clean shaven before donning any respirator to assure a proper fit. Positive and negative fit testing procedures shall be followed before each exposure period. A record shall be maintained for all fit testing procedures for each employee.

4.3.11. Exposure Assessments.

When levels of respirable Silica are suspected to be above the action level of 25micrograms per cubic meter of air over an 8 hour work shift, air sampling and measurements shall be taken to ensure the employees are not exposed to respirable Silica levels above the PEL. This assessment can be performed by taking samples from individuals or a representative sample from employees.

When changes occur in the workplace such as the introduction of new materials or new work practices, additional exposure assessments shall be performed.

4.3.12 Medical Surveillance.

Medical surveillance is the process by which an employee is examined to a) determine if he or she can be exposed to respirable Silica without experiencing adverse health effects; b) identify respirable Silica related adverse health effects so appropriate measures can be taken; and c) determine the employee's fitness to use PPE such as respirators.

These tests, conducted by a physician or other licensed healthcare professional, will be provided to employees who are exposed at or above the action level for 30 days or more per year, experiencing signs or symptoms of adverse health effects associated with respirable Silica, or involved in significant or unexpected exposures.

4.3.13 Training.

Training shall be provided to employees who may be exposed to respirable Silica at or above the action level, 25 micrograms per cubic meter of air over an 8 hour time weighted average shift.

Training shall include all the elements of this company plan, OSHA regulations, specific tasks to reduce exposure, the health hazards of exposure to respirable Silica, and the purpose of medical surveillance and evaluation.

Employees shall demonstrate an understanding of all aspects of above training.

Training shall be ongoing on a regular scheduled basis and documented.

4.3.14 Recordkeeping.

The program managers shall be responsible for maintaining records of:

1. All training related to awareness of respirable Silica, proper control of dusts and mists, housekeeping methods, and personal protective equipment.
2. Medical surveillance records and reports.
3. Measurements and records related to exposure assessments.

4.4 Lead Awareness Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

4.4.1 Program Objective:
To keep employees aware of the hazards of lead exposure.

4.4.2 Program Management:

The Jack Moore Associates, Inc. Lead Awareness Program shall be managed by Peter E. Michaud who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.

4.4.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the. Jack Moore Associates, Inc. Lead Awareness Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

4.4.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

4.4.5 Background

Lead is found in batteries, pipes, solder, various metal products, electrical equipment, many paints prior to 1978, corrosion resistant industrial paints, radiation shielding, and ammunition. DOE records show 24 safety incidents involving lead and lead compounds over the past 5 years. Almost 60% of the occurrences resulted in worker exposures and

unsafe exposure levels in workspaces. The remaining cases involved environmental concerns and potential lead hazards not properly identified and analyzed.

4.4.6 What are the Hazards

Lead is absorbed primarily through the lungs and stomach, is cumulative in the body, and can potentially cause lead poisoning. Left untreated, lead poisoning can damage the blood forming system, internal organs, including the reproductive system, kidneys, nervous system and the brain. Symptoms of chronic overexposure include metallic taste in the mouth, nausea, weakness, insomnia, headaches, tremors, numbness, and severe abdominal pain. Severe lead poising can lead to seizures, coma and death.

4.4.7 OSHA Standards

OSHA standards 29 CFR 1910.1025 and 29 CFR 1926.62 at a permissible exposure limit (PEL) of fifty milligrams of lead per cubic meter of air (50 uf/m3), averaged over an 8 hour work day. For potentially higher exposure levels, appropriate respirators, protective work clothing, and other controls must be used. Furthermore, OSHA requires monitoring of affected workers for lead exposure when the OSHA action level of 30 ug/m3 is anticipated.

In addition, OSHA requires a housekeeping program sufficient to maintain all surfaces as free as practicable of accumulations of lead dust.

Waste lead and lead-containing cleanup residues (such as dust from vacuuming) may be designated hazardous wastes as defined in 40 CFR 261, and special handling and worker training may be required under applicable sections of 40 CFR 262 through 268. Furthermore, releases of reportable quantities of lead-containing wastes or compounds require reporting in accordance with 40 CFR 302.

4.4.8 Controlling the Hazard – Lead Storage

●Although it is unlikely that our employees will encounter lead in their normal work duties, if a Job Hazard Analysis reveals the presence of a lead hazard, training will be provided to all employees who may become exposed to the presence of lead.

●Lead awareness training educates the employee on the dangers of lead exposure. This training is to ensure that the employee DOES NOT DISTURB the hazard.

●Specialized training is required for those who must disturb or remove lead in their work process.

●Use inventory tracking to facilitate proper lead storage and to keep inventories to a minimum.

●Store lead in containers or covered in specially designed areas.

●Routinely monitor lead inventories to check for lead dust contamination.

4.4.9 General Good Work Practices

●When necessary, seal off the work area with 6 mil flexible plastic sheeting and wear properly fitting HEPA respirator and protective clothing and equipment.

●Post warning signs where lead exposure may occur.

●Clean up with a HEPA vacuum; for small areas where a HEPA vacuum is unavailable, wet clean surfaces with soap having phosphates (the latter binds with lead)

●Never remove lead paint by power sanding or grinding without a HEPA vacuum attached.

●Never remove lead paint by open torch or high heat gun settings. The process creates highly toxic fumes and dust. Contained blasting or pressure washing can be used, but only by certified lead abatement workers.

●Cleaning affected areas should take place during the workday and after the job to minimize contamination.

●When coming in contact with lead, it is important to wash hands and face thoroughly before eating or drinking and also at the end of the work shift.

●Do not bring contaminated clothing home.

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4.5 Exposure Control Plan, Bloodborne Pathogen Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

4.5.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee on the importance of avoiding exposure to blood and bloodborne pathogens. It is our goal to provide full information and training to each employee in order to assure the safest possible conditions in the event of an injury or exposure to bodily fluids.

4.5.2 Program Management:

The Jack Moore Associates, Inc. Exposure Control Plan, Bloodborne Pathogen Program shall be managed by Peter E. Michaud, who shall be responsible for:

(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(f) File appropriate reports with respective governmental authorities.

4.5.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Exposure Control Plan, Bloodborne Pathogen Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. They shall also be responsible for training in the proper use of protective equipment. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Managers.

4.5.4 Program Updates:

The Jack Moore Associates, Inc. Exposure Control Plan, Bloodborne Pathogen Program shall be evaluated quarterly and updated as new information becomes available.

4.5.5 Information Accessibility:

All employees shall have full access to the information contained in this Exposure Control Plan, Bloodborne Pathogen Program. This written plan shall be posted near the "Right to Know" station in each branch, and all employees shall be notified of its location.

4.5.6 Definitions:

"Blood" means human blood, human blood components, and products made from human blood.
"Bloodborne Pathogens means pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV), and human immunodeficiency virus (HIV).
"Contaminated" means the presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.
"**Decontamination"** means the use of physical or chemical means to remove, inactivate, or destroy bloodborne pathogens on a surface or item to the point where they are no longer capable of transmitting infectious particles and the surface or item is rendered safe for handling, use, or disposal.
"Exposure Incident" means a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that result from the performance of an employee's duties.
"Handwashing Facilities" means a facility providing an adequate supply of running potable water, soap, and single use towels or hot air-drying machines.
"HBV" means hepatitis B virus.
"HIV" means human immunodeficiency virus.
"Licensed Healthcare Professional" is a person whose legally permitted scope of practice allows him or her to independently perform the activities required by paragraph (f) 1926CFR, 1910.1030 General Industry Standards, Hepatitis B vaccination and Post Exposure evaluation and Follow up.
"Other Potentially Infectious Materials" means

1. Any and all bodily fluids.
2. Any unfixed tissue or organ (other than intact skin) from a human (living or dead); and
3. HIV- containing cell or tissue cultures, organ cultures, and HIV- or HBV-containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected HIV or HVB.

"Parenteral" means piercing mucous membranes or the skin barrier through such events as needlesticks, human bites, cuts and abrasions.

"Personal Protective Equipment" is specialized clothing or equipment worn by an employee for protection against a hazard. General work clothes (e.g. uniforms, pants, shirts, or blouses) not intended to function as protection against a hazard are not considered to be personal protective equipment.

"Regulated Waste" means liquid or semi –liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling; contaminated sharps; and pathological and microbiological wastes containing blood or other potentially infectious materials.

"Source Individual" means any individual, living or dead, whose blood or other potentially infectious materials may be a source of occupational exposure to the employee. Examples include, but are not limited to, hospital and clinic patients, clients in institutions for the developmentally disabled, trauma victims, clients of drug and alcohol treatment facilities, residents of hospices and nursing homes, human remains, and individuals who donate or sell blood or blood components.

"Sterilize" means the use of a physical or chemical procedure to destroy all microbial life including highly resistant bacterial endospores.

"Universal Precautions" is an approach to infection control. According to the concept of Universal Precautions, all human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne pathogens.

"Work Practice Controls" means controls that reduce the likelihood of exposure by altering the manner in which a task is performed.

4.5.7 Exposure Control

During the normal course of events, employees of Jack Moore Associates, Inc. are not exposed to occupational sources of human blood or other potentially infectious materials. However, universal precautions shall be observed to prevent exposure to these materials in the event of an accident or injury on the work site, and training shall be provided prior to initial assignment and within one year of previous training. Training records shall be kept and maintained for a minimum of 3 (three) years. Under circumstances in which differentiation between body fluid types is difficult or impossible, all body fluids shall be considered potentially infectious materials.

Emergency first aid should be left to medical professionals if possible. However, if first aid must be administered by an employee, there is a Biohazard Response Kit at the right to know station. The Biohazard Response Kit consists of disposable rubber gloves and other personal protective equipment which must be worn when assisting an injured individual, germicidal fluids and surface wiping cloths, absorbent powder for spills, and bags for disposal of infectious waste. Gloves and personal protective equipment must be

disposed of properly. Gloves shall be single use gloves and shall not be washed or decontaminated for re-use. After removal of gloves and personal protective equipment, employees must wash their hands thoroughly with soap and water. Handwashing facilities shall be readily available. In the event there are no handwashing facilities, antiseptic solutions or towelettes shall be made available for use. All above mentioned PPE shall be provided at no cost to the employee.

All equipment and surfaces which have come into contact with potentially infectious materials shall be thoroughly cleaned and disinfected.

4.5.8 Post Exposure Evaluation

In the event of an employee coming in contact with human blood or other potentially infectious materials, the employee shall have a confidential medical evaluation consisting of at least the following elements.

1. Documentation of the route(s) of exposure and the circumstances under which the exposure incident occurred.
2. Identification and documentation of the source individual. The source individual's blood shall be tested as soon as feasible and after consent is obtained in order to determine HBV and HIV infectivity. When the source individual is already known to be infected with HBV or HIV tests need not be repeated. Results of the tests shall be made known to the exposed employee.
3. The exposed employee's blood shall be collected as soon as feasible and tested after consent is obtained. If the employee consents to baseline blood collection but does not give consent at that time for HIV serologic testing, the sample shall be preserved for at least 90 days. If within 90 days the employee consents to the test, such testing shall be done as soon as feasible. Hepatitis B vaccine shall be made available to all employees with occupational exposure at no cost to the employee.
4. Jack Moore Associates shall ensure that the healthcare professional responsible for the employees HBV vaccination is provided a copy of OSHA standard 1910.1030, a description of the employees duties as the relate to the exposure incident, documentation of the route(s) of exposure, results of the source individual's blood testing, and all medical records relevant to the appropriate treatment of the employee including vaccination status.
5. Jack Moore Associates shall obtain and provide the employee with a copy of the evaluating healthcare professional's written opinion within 15 days of the completion of the evaluation. Medical records shall be kept and maintained for the duration of employment plus 30 (thirty) years.

4.6 Environmental Protection Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

4.6.1 Program Objective:

It is our objective to implement sound stewardship practices that are protective of the air, water, land, and other natural and cultural resources impacted by Jack Moore Associates, Inc. operations and to meet or exceed compliance with applicable environmental; public health; and resource protection laws and regulations.

4.6.2 Scope:

The program is intended for all employees involved in activities associated with the use, storage, disposal and transportation of waste; emissions to air; discharges to water; and management of cultural and other natural resources.

4.6.3 Requirements:

Reduce or eliminate the generation of waste, the release of pollutants to the environment, and the use of ozone-depleting substances through source reduction, re-use, segregation, and recycling and by the use of environmentally preferable products and services.

Ensure the early identification of, and appropriate response to, potential adverse environmental impacts associated with JMA operations, including, as appropriate, preoperational assessment, and surveillance monitoring.

By far, in our operations, the largest potential impact to the environment would come from concrete slurry as a byproduct of cutting or coring concrete or masonry materials. Our standard operating procedures dictate the requirement to collect this byproduct and store it in large drums for settling out. After settling, the clear water is extracted and disposed of properly. The ‘hardened’ product at the bottom of the drum is also disposed of properly by delivering it to a local quarry for inclusion in crushed stone products.

Every effort is made to prevent discharge into storm drains and contaminating the water supply.

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4.7 Hexavalent Chromium Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 25, 2021

4.7.1 Program Objective:
It is our intent to keep our employees aware of the dangers associated with Hexavalent Chromium and to provide employees with guidelines to protect them from exposure to airborne Hexavalent Chromium.

4.7.2 Program Management:

The Jack Moore Associates, Inc. Hexavalent Chromium Safety Program shall be managed by Peter E. Michaud who shall be responsible for:

7. Program implementation.
8. Employee training for existing and new personnel including temporary and contract personnel if applicable.
9. Maintenance of complete and up-to-date records and documentation.
10. Manage all questions and concerns regarding the program.
11. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
12. File appropriate reports with respective governmental authorities.

4.7.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Hexavalent Chromium Safety Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Managers.

4.7.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

4.7.5 Hexavalent Chromium – What is it?

Hexavalent Chromium is a compound that is almost always man made and it is used in a variety of industries. Chromium is an element which may have various valence states. A valence state refers to how many electrons are available to bond with other elements or compounds. Hexavalent Chromium is also called Chromium 6.

4.7.6 Where is Hexavalent Chromium found?

1. Chromium pigments in dyes, plastics and inks
2. Chrome plating on metals to prevent corrosion.
3. Paints, primers, and other coatings.
4. Chromium is an important part of stainless steels in varying amounts.
5. OSHA estimates that 48% of workers affected by Hexavalent Chromium are welders. Welders can be exposed when fumes are released while welding stainless steels, chromium alloys and chrome plated metals.
6. Trace amounts may be found in Portland cement.

4.7.7 Health Effects of Exposure.

There are several ways Hexavalent Chromium can enter our bodies; called routes of entry. The primary route of entry is inhalation. Employees can inhale dusts, mists, and fumes containing Hexavalent Chromium when performing tasks such as welding or applying paints or coatings containing chromates.

Prolonged exposure can lead to bronchitis, pneumonia, asthma, and lung cancer. Some symptoms of inhalation exposure may include runny nose, sneezing, coughing, itching, and a burning sensation. Chronic symptoms may include sores in the nose, nosebleeds, and perforated septum.

Direct contact with the eyes can cause permanent eye damage. Contact with skin can produce contact dermatitis or skin ulcers referred to as chrome holes.

Dust particles of chromium can accumulate on clothing, hands, and food leading to ingestion. Ingestion of Hexavalent Chromium can lead to liver, kidney, and gastrointestinal damage. Some symptoms include abdominal pain, vomiting, and hemorrhaging.

4.7.8 Protective Measures.

The following measures are to protect you and others from exposure to Hexavalent Chromium:

9. Employers must implement controls to limit exposures when there is an average exposure of five micrograms of chromium 6 per cubic meter of air over the course of an 8 hour work shift. Five micrograms of chromium 6 per cubic meter is a measurement known as the Permissible Exposure Level (PEL).
10. Engineering controls and work practice controls must be put in place to reduce exposure levels to below the PEL.
11. Ventilation and exhaust systems are examples of engineering controls.
12. When engineering and work practice controls do not sufficiently reduce exposure levels, appropriate respirators must be used to protect the employees.

4.7.9 Exposure Assessments.

When levels of Hexavalent Chromium are suspected to be above the action level of 2.5 micrograms per cubic meter of air over an 8 hour work shift, air sampling and measurements shall be taken to ensure the employees are not exposed to Hexavalent Chromium levels above the PEL.

When changes occur in the workplace such as the introduction of new materials, additional exposure assessments shall be performed.

4.7.10 Protective Equipment and Clothing.

1. If contact with Hexavalent Chromium is likely, employees will be provided with training on the dangers of exposure.
2. Employees potentially exposed to Hexavalent Chromium will be provided with appropriate personal protective equipment and/or clothing.
3. Contaminated clothing and equipment used during the work shift must be replaced with street clothes before leaving the workplace. The clothing change process must be conducted in change rooms with separate storage facilities for work and street clothes.
4. Employees exposed to Hexavalent Chromium must decontaminate by washing hands, face and equipment before taking breaks or eating lunch. Eating or drinking in the contaminated work area is strictly prohibited.

4.7.11 Housekeeping.

1. Hexavalent Chromium, as a dust, can settle on shelving, equipment, floors, and other surfaces and it should be removed as soon as feasible to prevent it from becoming airborne and respirable and to minimize skin contact.

2. Clean surfaces by means of a HEPA vacuum system or by wet sweeping or wet scrubbing.
3. Dry sweeping, brushing, or using compressed air is prohibited.

4.7.12 Regulated Areas.

OSHA's regulation for Chromium 6, 29 CFR 1910.1026 requires that "regulated areas" be established when exposure levels are suspected to be above the PEL.

Employers are required to mark these areas with signs, barricades, or other measures. Only fully trained employees wearing appropriate protective equipment shall be allowed in regulated areas.

No food and drink is allowed in regulated areas.

4.7.13 Medical Surveillance.

Medical surveillance is the process by which an employee is examined to a) determine if he or she can be exposed to Chromium 6 without experiencing adverse health effects; b) identify Chromium 6 related adverse health effects so appropriate measures can be taken; and c) determine the employee's fitness to use PPE such as respirators.

These tests, conducted by a physician or other licensed healthcare professional, will be provided to employees who are exposed at or above the action level for 30 days or more per year, experiencing signs or symptoms of adverse health effects associated with Chromium 6, or involved in significant or unexpected exposures.

4.7.14 Recordkeeping.

The program managers shall be responsible for maintaining records of:

4. All training related to awareness of Hexavalent Chromium, proper control of dusts and mists, housekeeping methods, and personal protective equipment.
5. Medical surveillance records and reports.
6. Measurements and records related to exposure assessments.

Personal Protective Equipment

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

1926.95(a) Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields or barriers, shall be provided, used and maintained, in a sanitary and reliable condition wherever it is necessary by reason of hazards, radiological 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.

Employee owned PPE shall be permitted. However, as the employer, we shall ensure the adequacy of the PPE and include the PPE in the training and documentation. PPE must be determined to fit properly to ensure proper protection. Supervisors shall be responsible, through a hazard assessment, to determine the need for PPE and to ensure that PPE, when worn out or damaged, is removed from service replaced promptly.

Training:

Each employee shall receive training on what Personal Protective Equipment should be worn, the limitations of the equipment, how and when it should be worn, how it should be put on and taken off, how to make adjustments if necessary, and how to clean and maintain the equipment. Each employee must demonstrate an understanding of the training received and the ability to use and maintain the equipment properly. If an employee demonstrates a lack of understanding or skill, or if there are changes in job conditions or new PPE introduced, further training shall be warranted.

Training shall be documented and maintained on file at Jack Moore Associates, Inc., 13 McCracken Rd., Millbury, MA 01527.

5.1 Eye Protection Program

Purpose:

To reduce the potential for eye injury, to ensure compliance with the Occupational Health and Safety Act, and to provide guidance for the selection of suitable eye protection. Training shall be provided to ensure the proper use of all personal protective equipment. Retraining shall be provided when the type of PPE changes, when the employee does not use the PPE, or demonstrates improper use due to insufficient understanding. All training shall be documented and kept on file at Jack Moore Associates, Inc. home office.

Scope:

All individuals, including but not limited to employees, management and visitors, in danger of eye injury while performing work on jobsites or within our facilities are required to wear protective eyewear.

Eyewear:

Protective eyewear shall meet the specifications contained in ANSI Z87.1.

Supervisors shall determine the need for eye protection in tasks assigned to employees under their supervision by means of a signed hazard assessment. They shall supply or ensure that appropriate eyewear is available for all who are required to use protective eyewear. Supervisors shall also provide instruction regarding the proper use of protective eyewear, inspection, and maintenance.

Individuals required to wear protective eyewear shall use the eyewear properly as prescribed by the supervisor and follow prescribed guidelines for care and maintenance of all safety equipment.

Equipment:

Protective eyewear (safety glasses) assigned by Jack Moore Associates, Inc. shall be ERB Boas, Millenia, Uvex Genesis, Pyramex Ztec, or approved equal. Protective eyewear shall be worn whenever a hazard is present or may arise.

Where there is a danger of liquids such as hazardous chemicals, being splashed into the eyes, chemical splash goggles shall be used. When full face shields are required, they shall be considered secondary eye protection and safety glasses or splash goggles shall be worn with the face shield.

Inspection:

Individuals required to use protective eyewear shall perform a visual inspection before each use. Protective eyewear that has received a blow, restricts vision due to scratches on

the lenses, or otherwise does not offer full protection as intended by the manufacturer shall be replaced immediately.

2 Foot Protection Program

1926.95(a) Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields or barriers, shall be provided, used and maintained, in a sanitary and reliable condition wherever it is necessary by reason of hazards, radiological 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.

Purpose:

To reduce the potential for foot injury, to ensure compliance with the Occupational Health and Safety Act, and to provide guidance for the selection of suitable foot protection.

Scope:

All individuals, including but not limited to employees, management and visitors, in danger of foot injury from falling or rolling objects or puncture by sharp objects, while performing work on jobsites or within our facilities.

Footwear:

Protective footwear shall meet the specifications contained in ANSI Z41-1991.

Closed Toe Shoes

Any individual working in the field or on the premises should consider the possible hazards from dropping objects on their feet. Many workers take the extra precautions needed to protect their hands and face but neglect their feet. Open-toed shoes, walking/running shoes, or sandals have no place in the workplace. In order to prevent serious injury, wear closed toe shoes.

Steel Toed Shoes vs. Toe Guards

When working in areas where injuries could occur to the feet by falling or rolling objects, protective footwear is required by OSHA. The criteria for protective footwear come from OSHA's Occupational Foot Protection Standard, 29CFR 1910-136. This standard states protective footwear shall comply with the American National Standard Institute (ANSI) Z41-1991 Standard. The ANSI standard requires specific compression and impact testing on steel toes in protective footwear. it also states, "the steel toe should be incorporated into the construction and be an integral part of the footwear."

Toe guards cover the toes on the outside of the footwear and are usually secured by strapping. In the OSHA standard, it states that footwear shall comply with the ANSI

Z41.1 or shall be demonstrated by the employer to be equally effective. Most manufacturers of toe guards test their toe guards to meet the ANSI requirements for impact and compression testing thus making them equally effective.

5.3 Hand Protection Program

1926.95(a) Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields or barriers, shall be provided, used and maintained, in a sanitary and reliable condition wherever it is necessary by reason of hazards, radiological 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.

Purpose:

To reduce the potential for hand injury, to ensure compliance with the Occupational Health and Safety Act, and to provide guidance for the selection of suitable hand protection. Special attention must be paid to preventing hand injuries. According to the U.S. Bureau of Labor Statistics, hand injuries are second only to back injuries in lost work days. Hand injuries send more than one million workers to the hospital annually.

In one study conducted by BLS, 70% of workers who had a hand injury were not wearing gloves. The remaining 30% did wear gloves, but the gloves were inadequate, damaged, or the wrong type for the hazard present.

Scope:

All individuals, including but not limited to employees, management and visitors, in danger of hand injury from burns, bruises, abrasions, cuts, punctures, fractures, amputations, chemical exposures, or vibration, while performing work on jobsites or within our facilities shall be protected by appropriate gloves for the task.

Hazards and types of gloves:

For most of our operations, cuts, bruises, and abrasions are the most common hazard facing our technicians. In which case a good pair of work gloves will protect the hands from injury. These will also protect the hands from burns from hot objects. Special padded gloves shall be used to prevent injury from heavy vibration from tools such as demolition hammers and grinders.

Protection from chemicals will be handled on a case by case basis because no one type of glove is resistant to all chemicals. The Safety Data Sheet will describe the correct type of gloves to be worn.

When working with sharp edges and objects, Kevlar gloves will prevent serious injury.

For protection against electric shock, lineman’s gloves shall be worn and tested at least every six months for integrity.

Use and care:

Wear the proper size gloves. Proper fit improves needed dexterity. Your hands should be clean before donning gloves. Fabric or leather gloves should be cleaned regularly or discarded.

Latex gloves may cause a reaction in some people. Use rubber or nitrile gloves instead if you are sensitive to latex.

Replace gloves if they have cuts, tears, holes, or other defects.

5.4 Head Protection Program

1926.95(a) Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields or barriers, shall be provided, used and maintained, in a sanitary and reliable condition wherever it is necessary by reason of hazards, radiological 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.

Purpose:

To reduce the potential for head injury, to ensure compliance with the Occupational Health and Safety Act, and to provide guidance for the selection of suitable head protection.

Scope:

All individuals, including but not limited to employees, management and visitors, in danger of head injury while performing work on jobsites or within our facilities shall be protected from overhead hazards. Supervisors shall determine the need for PPE by means of a signed hazard assessment. Training shall be provided to ensure the proper use of all personal protective equipment (PPE). Retraining shall be provided when the type of PPE changes, when the employee does not use the PPE, or demonstrates improper use due to insufficient understanding. All training shall be documented and kept on file at Jack Moore Associates, Inc. home office.

Headwear:

Protective headwear shall meet the specifications contained in ANSI Z89.1 and be of class E, G, and C.

Class E headwear is intended to provide the user with protection against impact and penetration, is non-conducting and must pass the dielectric strength test specified for Class E headwear (20,000 volts).

Class G headwear is intended to provide the user with protection against impact and penetration, is non-conducting and must pass the dielectric strength test specified for Class G headwear (2200 volts).

Class C headwear is intended to provide the user with protection against impact and penetration only.

Supervisors shall determine the need for head protection in tasks assigned to employees under their supervision. They shall supply or ensure that appropriate headwear is

available for all who are required to use protective headwear. Supervisors shall also provide instruction regarding the proper use of protective headwear, inspection, and maintenance.

Individuals required to wear protective headwear shall use the headwear properly as prescribed by the supervisor and follow prescribed guidelines for care and maintenance of equipment.

Equipment:

Headwear assigned by Jack Moore Associates, Inc. shall be ERB model OMEGA II Type 1 with six point suspension or approved equal. Headwear shall be worn in the forward position only as intended by the manufacturer unless the headwear bears the reverse donning mark.

Inspection:

Individuals required to use protective headwear shall perform a visual inspection before each use. Inspection shall include the shell for cracks, dents, or penetrations, loss of gloss or chalking. The suspension shall be inspected for cracks and torn or frayed straps. The suspension shall maintain a distance of about 1 inch to 1 1/4 inches between the shell and the head.

Headwear that has received a severe blow shall be destroyed and replaced immediately.

Headwear shall not be painted and shall not have stickers or decals to prevent proper inspection.

Headwear shall be maintained and washed as recommended by the manufacturer.

5.5 Hearing Conservation Program

Purpose:

To provide information and guidelines to supervisory personnel who oversee work tasks and environments where sound levels exceed a time-weighted decibel rating of 85 dBA during the course of a normal workday. These guidelines are to be implemented to protect employees from potentially harmful effects of exposure to excessive noise.

Scope:
All individuals, including but not limited to employees, management and visitors, while performing work on jobsites or within our facilities. All workers who are subjected to a noise level of 85 dBA (action level) or above are to be included in a Hearing Conservation Program.

Audiometric testing shall be made available to all employees who are exposed to occupational noise which equals or exceeds an 8-hour time weighted average of 85 decibels. The testing shall be provided at no cost to the employee. Within 6 months of an employee's first exposure at or above the action level, a valid baseline audiogram shall be established against which future audiograms can be compared. The employee may not be exposed to workplace noise for a period of 14 hours before the baseline audiogram. At least annually, the employee shall be required to have an audiogram to determine any shift in the standard threshold. If a shift is detected, the employee shall be notified in writing within 21 days. A standard threshold shift may require re-evaluation of the hearing protection provided and a medical evaluation may be required.

Monitoring:

All workplaces suspected of having noise levels that may exceed the action level are to be monitored by management to identify employees who receive daily noise doses at or above the action level.

1. Noise levels must be re-measured whenever any change relating to noise production is suspected of increasing exposures to the extent that additional employees may receive at or above the action level, or the attenuation provided by the selected hearing protection is rendered inadequate.

2. Noise levels must also be re-measured to determine the effectiveness of any engineering controls that are installed.

3. Monitoring may be accomplished by an area survey technique in which sound level meter readings are combined with estimates of the length of exposure of individuals to particular sound levels in order to calculate an eight (8) hour Time Weighted Average (TWA).

Hearing protection:

Supervisors shall determine the need for PPE by means of a signed hazard assessment. Hearing protection must be made available to all workers exposed at or above the action level. The use of hearing protection is mandatory for those exposed at or above the Permissible Exposure Limit (PEL), and for those exposed at or above the action level. Training shall be provided to ensure the proper use of all personal protective equipment. Retraining shall be provided when the type of PPE changes, when the employee does not use the PPE, or demonstrates improper use due to insufficient understanding. All training shall be documented and kept on file at Jack Moore Associates, Inc. home office.

1. Hearing protection must reduce exposure to 85 dBA or less.

2. Jack Moore Associates, Inc. shall provide a variety of suitable hearing protectors from which employees may choose. This requires the availability of at least one type of plug and one type of muff.

3. These devices are to be supplied to employees at no cost and replaced as necessary. The company is not expected to pay for an unlimited supply of protectors or to replace devices that are lost or damaged due to employee negligence.

Training:

Employees exposed at or above the action level must be trained at least annually regarding:
* the effects of noise,
* the purpose, advantages, disadvantages, and attenuation of hearing protection being offered,
* the selection, fitting, and care of protectors.

Recordkeeping:

Noise exposure records shall be retained for two years, but data older than two years shall not be discarded unless re-monitoring has been performed.

Noise reduction:

The reduction or elimination of noise producing sources and/or employee exposure should be sought through administrative (e.g., modified work schedule). and/or engineering controls.

5.6 Respiratory Protection Program

Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to air contaminated with harmful dusts, fogs, fumes mists, gases, smokes, sprays or vapors in the workplace. It is our primary objective to prevent atmospheric contamination by enclosure or confinement of the operation, ventilation or substitution of less toxic materials whenever possible. When effective engineering controls are not feasible, or while they are being instituted, appropriate respirators shall be used.

Program Management:

The Jack Moore Associates, Inc. Respiratory Protection Program shall be managed by Peter E. Michaud who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.
7. Handle all requests for Safety Data Sheets (SDS) and chemical listings on a timely basis.

Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Respiratory Protection Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to understand"** station and all employees shall be notified of its location.

Planning:

This program does not address atmospheres that are Immediately Dangerous to Life and Heath (IDLH). Therefore, employees are prohibited under the limitations of this program, to enter or perform work in an atmosphere that is IDLH.

Employees who may be required to perform work duties in a potentially contaminated atmosphere will be issued an appropriate respirator by Jack Moore Associates, Inc. at no cost to the employee. Supervisors shall determine the need for PPE by means of a signed hazard assessment. Employees shall be trained in the proper use of this respirator by the program manager or the Assistant Program Managers. Retraining shall be provided annually or when the type of PPE changes, when the employee does not use the PPE, or demonstrates improper use due to insufficient understanding. All training shall be documented and kept on file at Jack Moore Associates, Inc. home office.

This personal protective equipment will be maintained on a daily basis during the period(s) of use. Respirators used in the Jack Moore Associates, Inc. Respiratory Protection Program shall be, but not limited to half or full-face masks with appropriate filters and or vapor cartridges or disposable masks conforming to 42 CFR 84. Self-contained or supplied air systems are not included in this program as of June 8, 1999. Maintenance of respirators shall be as follows:

1. Respirators shall be cleaned and disinfected after each use.
2. Respirators shall have an appropriate identification mark to prevent use by another employee. Respirators shall not be shared with another employee.
3. Respirators shall be stored in a convenient, clean and sanitary location.
4. Respirators shall be fitted to each individual.
5. Respirators shall be inspected during cleaning. Worn or deteriorated parts shall be replaced. If parts are unavailable the respirator shall be replaced with a new respirator.

Company Policy:

The program manager and the Assistant Program Managers shall be responsible for the following operations and conditions.

1. Surveillance of the work area conditions, and degree of employee exposure and stress shall be maintained.
2. The Jack Moore Associates, Inc. Respiratory Protection Program shall be evaluated regularly to determine the effectiveness of the program.
3. Employees shall not be assigned to tasks requiring use of respirators unless it has been determined that they are physically able to perform the work and use the equipment.
4. Respirators shall be selected from among those jointly approved by the Mine Safety and Health Administration and the National Institute for Occupational Safety and Health (NIOSH) under the provisions of 30 CFR part 11.
5. Standard procedures shall be developed for respirator identification and use. These procedures shall include all information and guidance necessary for proper selection, use, and care. Possible emergencies and routine use of respirators should be anticipated and planned for.
6. The correct respirator shall be specified for each job. The respirator shall be chosen by the program manager or Assistant Program Managers supervising the operation.
7. Written procedures shall be prepared covering the safe use of respirators in dangerous atmospheres that might be encountered in normal operations or in emergencies. Personnel shall be familiar with these procedures and the available respirators.
8. In areas where the wearer, with failure of the respirator, could be overcome by toxic or oxygen deficient atmosphere, at least one additional man shall be present. A means of communication (visual voice or signal line) shall be maintained between both or all individuals present. Planning shall be such that one individual will be unaffected by any likely incident and have the proper rescue equipment to be able to assist the other(s) in case of emergency.

Respiratory protection is no better than the respirator in use, even though it is worn conscientiously. Frequent random inspections shall be conducted by the program manager(s) to assure that respirators are properly selected, used, cleaned, and maintained. Training in the use of respirators shall provide the users an opportunity to handle the respirators, have it fitted properly, test it’s face piece to face seal, wear it in normal atmosphere for a long familiarity period, and finally, to wear it in a test atmosphere. All training shall be completed before the employee is required to wear the equipment.

Every wearer shall be instructed on how the respirator should be worn, how to adjust it, and how to determine if it fits properly. Respirators should not be worn when conditions prevent a good seal. Such conditions may be but are not limited to growth of a beard or sideburns, a skull cap that projects under the face piece, or temple pieces on glasses. The absence of one or both dentures can also affect the fit of a face piece. The wearer shall be aware of these conditions and to assure proper protection, evaluate the fit of the respirator each time he puts it on. Medical evaluations prior to fit testing shall be confidential, during normal working hours, convenient, understandable, and the employee given a chance to discuss the results with the physician or other licensed health care professional

Employees are required to pass qualitative fit test (QLFT) or quantitative fit test (QNFT) before initial use, if a different respirator is used, and annually. Supervisors shall ensure that employees required to wear respiratory protection shall leave the contaminated area to change cartridges or wash equipment, or if they detect breakthrough or resistance.

Corrective lenses (eyeglasses) with temple bars shall not be worn with full face masks, as the temple bars extend through the face mask seal. Eyeglasses without temple bars may be used and taped to the wearers face under the mask. Eyeglasses do not affect the seal of half masks. Under no conditions are contact lenses allowed in contaminated atmospheres. This can be accomplished by following the manufacturers fitting instructions.

As of October 6, 2014, the only respirators that have been required by employees of Jack Moore Associates, Inc. are dust and mist respirators. These may be of the disposable type or the reusable half mask variety. When required to wear them, the disposable mask shall be a N95 type, and the half mask style shall be a 3M brand 6200M with appropriate components. When solid, liquid or oil mist particulates are to be avoided, the appropriate components for the half mask shall be #2091, P100 HEPA Filters. When organic vapors are present in addition to particulates #2097, P100/OV filters shall be used.

Note: The new NIOSH certification requirements for non-powered particulate respirators create three filter designations: N, R and P. The selection of N, R and P series filters depends on the presence or absence of oil particulates as follows.

1. If no oil particles are present in the work environment, use a filter of any series (N, R or P).
2. If oil particles are present use an R or P series filter. (R series is limited to 8 hours of use.)
3. If oil particles are present and the filter is to be used for more than 8 hours, use only a P series filter. Jack Moore Associates, Inc. will provide only the P series filter.

All particulate respirators used by employees of Jack Moore Associates; Inc. shall be approved under the new 42 CFR 84 NIOSH requirements.

Limitations and Warnings:

- Series 6200 respirators are for use by trained and qualified personnel in accordance with this program.
- Series 6200 respirators do not supply oxygen. Only positive pressure self-contained breathing apparatus or a pressure demand supplied air respirator with auxiliary escape bottle in air containing less than 19.5% oxygen, or in confined spaces, or in any unknown atmosphere.
- Do not use 6200 series respirators when the concentration of contaminants are unknown, or higher than the limits (Assigned Protection Factor) specified by applicable regulatory agencies, or at or above the immediately dangerous to life or health (IDLH) level.
- Do not use 6200 series respirators for firefighting, including escape from fire, or smoke as a result of a fire.
- Do not use 6200 series respirators for abrasive blasting.
- Do not use 6200 series respirators for emergency response, or spill clean-up unless the contaminants and their respective concentrations are known and the use of this type of respirator is allowable.
- Do not use 6200 series respirators if the sealing area of the face piece comes in contact with facial hair. OSHA does not permit facial hair, barrier creams, spectacle temples, or anything else interfering with the face piece-to face seal. Doing so will void all approvals and will risk injury. The user assumes all risks including OSHA fines if this condition exists.
- 6200 series respirators do not provide protection from contaminants that are absorbed through the skin. Additional protection is the responsibility of the wearer.
- Leave the contaminated area immediately and return to uncontaminated air if breathing becomes labored or difficult, if you smell, taste, or otherwise detect the contaminant, or if your senses detect any abnormal condition, or if dizziness occurs, or if the respirator is damaged.
- Never alter or modify the respirator. In making repairs, use only those parts recommended by the manufacturer. Never use competitive parts or air purifying elements with this respirator. Doing so will violate the NIOSH approval and will result in non-compliance to OSHA standards, as well as putting the wearer at risk of illness or injury.
- Air purifying respirators must not be used for protection against poor, inadequate, or unknown warning properties unless they contain an end-of-service-life indicator (ESLI). For the safe use of any air purifying respirator without an ESLI, the wearer must be able to detect, by odor or irritation, the contaminant at a safe level below the OSHA Permissible Exposure Limit (PEL). Compounds have poor or inadequate warning properties if one cannot detect that compound at concentrations below the PEL.
- The use of air purifying respirators will not completely eliminate all of the hazards encountered by the wearer. Exercise caution when entering any contaminated atmosphere when wearing a respirator.
- The following is a partial list of compounds that are considered to have poor warning properties.

This list is offered as a guide and is not intended to be inclusive. Do not use any air purifying respirator for protection against these substances, regardless of the time of exposure. For the correct respiratory protection against these substances, please see the Safety officer or assistant safety officer, or contact 3M Technical Services at 1-800-243-4630.

1. Aniline	9. Dimethylaniline	17. Methanol	25. Ozone
2. Arsine	10. Dimethylsulfate	18. Methyl bromide	26. Perchlorethane
3. Boron hydride	11. Ethyl cyanide	19. Methyl chloride	27. Perchloethylene
4. Bromine	12. Fluorine	20. Methylene chloride	28. Phosgene
5. Carbon dioxide	13. Hydrogen cyanide	21. Nitrogen oxides	29. Phosphine
6. Carbon monoxide	14. Hydrogen peroxide	22. Nitroglycerine	30. Stibine
7. Carbonyls	15. Hydrogen selenide	23. Nitromethane	31. Sulfur chloride
8. Cyanogen	16. Isocyanates MDI TDI HDI	24. Nitrobenzene	32. Vinyl chloride

Assembling Cartridges and Filters:

Chemical Cartridges and P100 Filters:

Align the cartridge down onto the cartridge connector and begin to turn the cartridge in a clockwise direction until an increasing amount of resistance is felt. Visually inspect the area between the cartridge and the face piece to ensure that the cartridge is seated correctly. Continue turning the cartridge until a "click" is heard. The "click" indicates a positive installation has been made. **Do not continue to turn the cartridge after the "click**". Repeat procedure on second side of face piece.

Preparations and Use:

Respirator Fit Tests:

A respirator fit test must be carried out before use and annually thereafter to determine the amount of protection it will provide. Respirator fitting tests are explained fully in OSHA Regulation 29 CFR 1910.034. The user assumes all risks of serious bodily injury which may result if a fit test is not performed or the respirator limitations are not followed.

Inspection:

The following respirator parts should be checked before using the respirator.
Headbands-Inspect for elasticity, breaks or tears in the material. Replace any worn or frayed straps. Make sure all fasteners and buckles are in place and attached properly.
Face piece- Check for signs of contamination or wear. Also check the shape of the face piece for distortion and the material for flexibility.

Inhalation and Exhalation Valves- Check the valves for tears, distortion, dirt between valve and seat, and for proper seating of the valves. Check that the exhalation valves cover is in its place.
Cartridges/Filters- Make sure cartridges/Filters are clean (do not attempt to clean by washing or blowing off with compressed air). Make sure plastic components of cartridge/filters and their attachment connectors on the respirator are not damaged.
Filter and Cartridge Selection- Select the appropriate chemical cartridge, particulate filter, or both if necessary, from the selection/identification chart above.

Donning Respirators:

Before beginning to don the respirator make sure the respirator is assembled correctly and is equipped with the proper filters and/or cartridges for the particular contaminant to be protected from. It is important to note that a good seal is not possible if the employee has facial hair.

1. Make sure the lower headbands are adjusted at the yoke. Remove protective eyewear, and place respirator under the chin and over the nose. The narrow part of the face piece should be over the nose.
2. Pull the crown strap over the head and adjust its placement until it is comfortable. The crown strap is adjustable in length for ease of fit.
3. Using both hands, hook the lower headband straps together behind the neck. Adjust the headbands by pulling sideways from the hook and loop. **Do not adjust at the face piece yoke.**
4. Adjust the upper headbands by pulling downward from the crown straps. Do not adjust headbands and tension at the yoke. Continue adjusting headbands until a comfortable fit has been obtained. **Do not over tighten the respirator to the face.**
5. Excess lengths of upper straps may be secured out of the way by using the clips molded into the crown straps. Use of these tabs also helps to reduce the possibility of headband slippage. **CAUTION:** if the respirator does not fit you correctly, you may not receive adequate protection. Each time you use a respirator you must check for proper fit before entering a contaminated area.

Positive and Negative Pressure User Seal Checks:
Positive and negative user seal checks must be performed each time the respirator is worn.

Positive Pressure, User Seal Check:

Firmly place the palm of the hand over RP10 exhalation valve cover and gently exhale into the face piece until a slight but definite pressure is created. When slight pressure is felt and no outward leakage of air between the face piece and the face is detected, the respirator is properly fitted. If leakage occurs, readjust the position of the face piece and tension of the headbands and re-check.

Negative Pressure, User Seal Check:

Firmly place the palms of the hands over cartridges or filters sealing off inhalation area. RP22 retainer can be used on cartridge to assist closing off airflow. Gently inhale

causing the face piece to collapse slightly. If the face piece does not collapse slightly or a leak occurs, readjust the position of the face piece and tension of the headbands and re-check.

Replacing Filters and Cartridges:

Leave the contaminated area immediately and replace filters and/or cartridges if:

- Your breathing becomes difficult.
- You smell or taste contaminants – gases, vapors, oils.
- You experience distress – nose or throat irritation, dizziness.
- You sense anything abnormal.
- You suspect a filter or cartridge is damaged or soiled.

Pad Style Filters:

1. Remove filter retainers and discard filters.
2. Insert new filter into the filter retainer with the printed side facing the wearer. Attach filter retainer to cartridge or filter base as described above.

Cartridges/P100 Filters:

1. Remove and discard cartridges/P100 filters.
2. Screw in new cartridge/filter to the point where it seals against the gasket until a "click" is heard as described above.

WARNING: In areas containing oil aerosols, replace your P series filters at least after 40 hours of use or 30 days from first use, whichever comes first, even if none of the above conditions occur. Please note that NIOSH has for a long time recommended that filters be replaced at least daily.

Cleaning and Disinfecting:

Respirators shall be cleaned after each day's use according to the following procedure:

Remove filters, cartridges, headbands, and valves from face piece. Immerse all parts except filters or cartridges, in a warm solution of germicidal detergent (110°F) – or in any solution of a commercially available that contains effective disinfectants. Parts should be scrubbed gently with the aid of a soft brush and rinsed thoroughly. Air dry.

Maintenance:

Your respirator must be kept in good condition to function properly. Replace any worn or deteriorated part immediately with the proper part. Refer to "Preparations and Use" above for more information.

Storage:

Your respirator was supplied with a plastic storage bag which can be marked for personal identification. When not in use the respirator shall be stored in the plastic bag. Do not store a clean respirator with contaminated cartridges. Cartridges and filters may be re-used if care is taken to prevent cross contamination between wearers. Store in a cool, dry area that is free from airborne contamination and out of direct sunlight. Re-check your respirator before using.

Disciplinary Action:

A written warning will be issued for the first safety violation. Removal from the project and loss of safe hours without pay will be imposed. The disciplinary action may vary with the severity of the violation. Supervisors who knowingly allow such a violation are subject to the same disciplinary action.

If a second safety violation occurs after a six-month period has passed, the disciplinary action will be treated as a first violation. If a second violation occurs within a six-month period, the employee will be immediately discharged, subject to rehire after 30 days. After a safety violation discharge, the Safety Officer(s) must approve any rehire after an interview with the considered employee.

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Jack Moore Associates, Inc.
Prime Drilling, Sawing, and Anchoring div.
6.1 Fall Protection Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

6.1.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to falls in the workplace. It is not only our goal to prevent fall incidents, but to eliminate potential fall hazards.

6.1.2 Program Management:

The Jack Moore Associates, Inc. Fall Protection Program shall be managed by Peter E. Michaud, who shall be responsible for:

(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(f) File appropriate reports with respective governmental authorities.

6.1.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Fall Protection Program. Bruno Frongillo, Brian Pastor, and Christopher Perry, Jack Moore Associates' competent persons, have been authorized to take prompt, corrective measures to eliminate working conditions that are unsanitary, hazardous or dangerous. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager(s).

6.1.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc. These should be submitted in writing to the Program Manager or the Program Assistant Manager(s) who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

6.1.5 Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to Understand"** station in each branch, and all employees shall be notified of it's location.

6.1.6 Planning:

Employees must receive training on the recognition of fall hazards and documentation shall be kept on file at Jack Moore Associates, Inc. home office.

Employees who may be required to perform work duties at an elevated level should consider the following possibilities to avoid a potential fall. In order of priority they are:

1. Eliminate the hazard. Make it impossible for a workman to fall. Perform as many operations as possible at ground level.
2. Control the work environment. Build guardrails or handrails to avoid a potential fall. Use specialty equipment such as lifts or scaffolding instead of working from a ladder. Be sure the elevated platform is sufficient to perform the necessary tasks without reaching beyond safety rails, etc. Refer to 29 CFR 1900.500 Subpart M.
3. Protect yourself and your co-workers from a fall. Tie off * using personal protective equipment such as a full body harness with a shock absorbing lanyard, or a fall arresting block. Inspect this equipment every time you use it. Once a week or once a month inspection is not sufficient. In the event of a fall using harnesses and lanyards, the equipment should not be reused. Refer to manufacturers' recommendations. All Personal Fall Arrest System equipment shall comply with ANSI A10.32 and OSHA 29 CFR 1926.502.
4. Prompt rescue plans must be in place prior to employees working on any elevated work surface to avoid suspension trauma after experiencing an arrested fall. Specific procedures shall be determined during pre-task planning.

* Tying off should be used as a last resort for fall protection. Remember our goal is to eliminate the hazard.

6.1.7 Company Policy:

Unprotected edges of working or walking areas six feet or more above a lower level must have employee protection from falls by use of handrails, guardrails, safety nets or personal restraint or arrest systems. In our facility, fall protection is provided where the walking/working surface is four feet or more above a lower level.

In the event an employee must work above another level, but less than six feet from that level, if unusually hazardous conditions are present the same rules apply. Remember our goal is to eliminate all fall hazards, not just those above six feet. Employees who choose to ignore these guidelines will be subject to immediate disciplinary action.

Excavations, wells, pits or shafts which may not be seen at job start-up due to progress of work must also be protected by guardrails, fences, covers or barricades.

6.1.8 Fall Protection Device Training and Plan Development: (By Competent Person).

Each employee required to work at elevated levels, must be instructed by a competent person in the proper use, limitations, and maintenance of personal fall protection devices and systems prior to the use of this equipment. Written documentation of this training must contain the name of the employee, the person responsible for the training and the date of training as well as any other pertinent information. Fall protection is not a substitute for fall prevention.

When personal fall protection devices must be used, a full body harness is required for *fall arrest*, *the use of body belts is strictly forbidden*. The particular procedures for the use of personal fall protection devices or systems are part of the training. The details are not included in this plan as procedures may vary with different manufacturers of these systems. All systems must comply with ANSI A10.32 and OSHA 29 CFR 1926.502. Systems or components complying with ANSI Z359.1 may also be used, but it is not required. Employees using personal fall protection equipment must always be accompanied by another employee in the immediate vicinity. An emergency means of communication is required to assist retrieval in the event of a fall. Retrieval methods and procedures must be planned and communicated before the start of any work activities. Procedures must also be reviewed at regular safety meetings.

If any violation of the above rules is observed, it is the responsibility of each employee to notify the employee involved and the immediate supervisor. Immediate correction of such a violation could save a life.

Violations may also require re-training as well as when deficiencies in training are noted, changes in the workplace require additional training, or when there are changes to the fall protection equipment being used.

6.1.9 Perimeter Guarding:

Perimeter guarding must meet standard handrail requirements. Handrails must have a top rail, mid rail and a four-inch minimum height toe board. All rails must be smooth to prevent snagging of clothing, lacerations and punctures. All vertical rail posts must be spaced a maximum of eight feet. Rails must be fabricated of 2" x 4" lumber, 2"x2"x3/8" steel angle 1-1/2" diameter steel pipe or equal structural shape with similar bending strength. 1/2" diameter extra improved plow steel (EIPS) wire rope may be used if installed with sufficient tightness and post spacing to withstand a 200 lb. lateral load with less than 3" resulting deflection. When wire rope is used as a top rail, it must be flagged every six feet with high visibility material. All posts must be anchored to withstand a 200 lb. load in any direction at the top with minimum resulting deflection.

Mid rails, screens, mesh or intermediate vertical members must withstand 150 lbs. of force. Toe boards must withstand a minimum force of 50 lbs. For additional information on minimum requirements, refer to OSHA standard 1926.500.

Perimeter guarding is required where there is a drop from one level to the next of six feet or more. When wire rope is used, tie off to the rope is prohibited unless it meets the requirements of a horizontal lifeline. No materials or equipment may be stored within four feet of a working edge.

Safety nets are to be used as a last resort and must meet specific requirements under OSHA standard 1926.502. Other fall protection methods must be utilized to prevent falls into the safety net.

6.1.10 Working Over or Near Water:

When working over or near water, where a drowning hazard may exist, the employee shall be provided with Personal Floatation Protection consisting of U.S. Coast Guard approved life jackets or work vests to be worn zipped up or securely fastened as designed. This equipment must be worn even if 100% tie off or other protective measures are in place. Tool belts should be easily removable in the event of a fall so as not to sacrifice the buoyancy of the floatation device.

Ring Buoys are required with 90 feet of line available for emergency rescue. Ring buoys must be placed less than 200 feet apart along the entire work area. It is suggested that ring buoys with 90 feet of line be placed 90 feet apart so that at their furthest reach the lines form an equilateral triangle with dry land, thereby enabling rescue from either point over a wider area and both points covering the entire triangular area. At least one lifesaving skiff must be immediately available for emergency rescue.

6.1.11 Working on Roofs:

In addition to required fall prevention/protection methods described above, warning line systems must be established six-feet from the roof edge and ten-feet when mechanical equipment is being used. Lines must be flagged every six-feet with high visibility material. Lines must have a minimum tensile strength of 500 lbs. Materials and equipment must not be stored within six feet from the roof edge unless guard rails are erected.

Controlled Access Zones (CAZ) and Safety Monitoring Systems (SMS) are OSHA approved last resort methods to accomplish roof work when other prevention/protection methods are not possible or may create more of a hazard. CAZ and SMS methods are not acceptable to Jack Moore Associates, Inc. as they do not offer positive prevention/protection and exposes the employee to falling.

6.1.12 Ladders:

Ladders should not be used when stairways, ramps or aerial lifts are feasible. When ladders must be used, employees must be 100% tied off when working at a height of six feet or more, unless the ladder is used for climbing or descending, and both hands are free to securely hold the ladder rungs. Tie off should be made to an acceptable anchorage point so that no free fall would be greater than six feet.

Ladders must be used at the proper angle of one foot horizontally for each four feet of vertical rise. Ladders must be equipped with nonskid pads when used on smooth surfaces. Ladder side rails must extend 36" above the landing. If an employee must let go of the ladder with either hand and no handrail is available, then the employee must be 100% tied off when using this ladder. All ladders must be secured at the top or held in place at the bottom until the top is secured.

Carry ladders horizontally never vertically. When carrying ladders 8 feet or more in length utilize 2 employees to carry each end.

6.1.13 Openings in a floor:

OSHA requires any opening in a floor 2 inches diameter or greater to be covered. This is not only to prevent falling through large openings, but also to prevent small objects from being dropped to a lower level, possibly inflicting injury on someone working on the lower level. Openings that are 12 inches X 12 inches or greater require perimeter guarding.

6.1.14 Investigation:

In the event that a fall or near miss occurs, refer to page 24 of this manual for investigation procedures.

6.1.15 Disciplinary Action:

A written warning will be issued for the first safety violation. Removal from the project and loss of safe hours without pay will be imposed. The disciplinary action may vary with the severity of the violation. Supervisors who knowingly allow such a violation are subject to the same disciplinary action.

6.2 Ladder Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

6.2.1 Purpose:

This program contains requirements for the safe and proper use of fixed ladders, portable wooden, metal, or fiberglass, used at Jack Moore Associates, Inc and on jobsites. The purpose is to provide reasonable safety for life, limb and property. The safety of all employees is the foremost objective of the program.

6.2.2 Scope:

All individuals, including but not limited to employees, management and visitors, while performing work on jobsites or within our facilities. This program covers the minimum requirements for the care and use of portable ladders in order to ensure safety under normal conditions of usage. The common type of portable ladders are wooden, metal, or fiberglass ladders. It is not the purpose of this program to specify all the details of construction for all the portable ladders. The scope is to provide information on the most common types used providing they meet the requirements of ANSI A.14 and OSHA 1910.25. Ladders shall be used as intended by the manufacturer.

6.2.3 Use and care:

To ensure safety and serviceability, the following precautions on the care of ladders shall be observed:

1. Ladders shall be of the TYPE 1A or Type 1AA only. Ladders shall be maintained in good condition at all times, the joint between the steps and side rails shall be tight, all hardware and fittings securely attached, and the movable parts shall operate freely without binding or undue play.
2. Metal bearings of locks, wheels, pulleys, etc., shall be frequently lubricated.
3. Frayed or badly worn rope shall be replaced.
4. Safety feet and other auxiliary equipment shall be kept in good condition to ensure proper performance.
5. Ladders shall be inspected frequently, and those which have developed defects shall be withdrawn from service for repair or destruction and tagged or marked as "Dangerous, Do Not Use."
6. Rungs should be kept free of grease and oil.

7. If a ladder is involved in any of the following, immediate inspection is necessary:

    a. If ladders tip over, inspect ladder for side rail dents or bends or excessively dented rungs. Check all rung-to-side-rail connections, check hardware connections and rivets for shear.

    b. If ladders are exposed to oil and grease, equipment should be cleaned of oil, grease or slippery materials. This can easily be done with a solvent or steam cleaning.

    c. Ladders having defects are to be marked (as indicated above) and taken out of service until repaired.

A simple rule for setting up a ladder at the proper angle is to place the base a distance from the vertical wall equal to one-fourth (¼) the working length of the ladder. The following safety precautions shall be observed in connection with the use of ladders:

1. Portable ladders shall, where possible, be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is one-quarter (¼) of the working length of the ladder (the length along the ladder between the foot and the top support). The ladder shall be so placed as to prevent slipping, or it shall be lashed or held in position. Ladders shall not be used in a horizontal position as platforms, runways or scaffolds.

2. Ladders designed for one (1) person shall not be used by more than one person at a time nor with ladder jacks and scaffold planks when use by more than one (1) person is anticipated. In such cases, specially designed ladders with larger dimensions of the parts should be used.

3. Portable ladders shall be so placed that the side rails have a secure footing. The top rest for portable ladders shall be reasonably rigid and shall have ample strength to support any applied load.

4. Ladders shall not be placed in front of doors opening toward the ladder unless the door is blocked open, locked, and/or guarded.

5. Ladders shall not be placed on boxes, barrels or other unstable bases to obtain additional height.

6. Ladders with broken or missing steps, rungs or cleats, broken side rails, or other faulty equipment shall not be used. Improvised repairs shall not be made.

7. Short ladders shall not be spliced together to provide long sections.

8. Ladders made by fastening cleats across a single rail shall not be used.

9. Ladders shall not be used as guys, braces or skids, or for other than their intended purpose.

10. Tops of the ordinary types of stepladders shall not be used as steps.

11. Portable ladders with reinforced rails shall be used only with the metal reinforcement on the underside.

12. No ladder should be used to gain access to a roof unless the top of the ladder extends at least three (3) feet above the point of support, at eave, gutter or roofline.

13. The user should equip all portable ladders with non-slip bases when there is a hazard of slipping. Non-slip bases are not intended as a substitute for care in safely placing, lashing or holding a ladder that is being used upon oily, metal, concrete or slippery surfaces.

14. On two-section extension ladders the minimum overlap for the two (2) sections in use shall be as follows:

Size of ladder (feet)	Overlap (feet)
Up to and including 36	3
Over 36 up to and including 48	4
Over 48 up to and including 60	5

15. The bracing on the back legs of step ladders is designed solely for increasing stability and not for climbing.

16. Portable ladders are designed as a one-man working ladder based on a 200-pound load.

17. The ladder base section must be placed with a secure footing.

18. The top of the ladder must be placed with the two (2) rails supported unless equipped with a single support attachment.

19. When ascending or descending, the climber must face the ladder.

20. Ladders must not be tied or fastened together to provide longer sections. They must be equipped with the hardware fittings necessary, if the manufacturer endorses extended uses.

21. Ladders should not be used as a brace, skid, guy or gin pole, gangway or for uses other than for which they were intended, unless specifically recommended for use by the manufacturer.

6.2.4 Wooden ladders:

1. Wooden ladders shall not be painted so that the wood can be inspected for cracks, damage and/or deterioration. All wood parts shall be free from sharp edges and splinters, and sound and free from accepted visual inspection from shake, wane, compression failures, decay or other irregularities. Low density wood shall not be used.

2. Wood stepladders shall be no longer than 20 feet. Stepladders as hereinafter specified shall be of three (3) types:

   Type I, Industrial Stepladder: 3 to 20 feet for heavy duty work, such as utilities, contractors, and industrial use.

   Type II, Commercial Stepladder: 3 to 12 feet for medium duty work, such as painters, offices, and light industrial use. Type II shall not be used on construction sites.

   Type III, Household Stepladder: 3 to 6 feet for light duty work, such as light household use. Type III shall not be used on construction sites nor in the JMA facility.

3. General requirements for wood stepladders are:

   a. A uniform step spacing shall be employed which shall be not more than 12 inches. Steps shall be parallel and level when the ladder is in position for use.

   b. The minimum width between side rails at the top, inside to inside, shall be not less than 11½ inches. From top to bottom, the side rails shall spread at least one (1) inch for each foot of length of stepladder.

   c. A metal spreader or locking device of sufficient size and strength to securely hold the front and back sections in open positions shall be a component of each stepladder. The spreader shall have all sharp points covered or removed to protect the user. For Type III ladders, the pail shelf and spreader may be combined in one unit (i.e., the shelf-lock ladder).

1. Single ladders shall be no longer than 30 feet.

2. Two-section extension ladders shall be no longer than 60 feet. All ladders of this type shall consist of two (2) sections, one to fit within the side rails of the other and arranged in such a manner that the upper section can be raised and lowered.

6.2.5 Portable metal ladders:

1. The spacing of rungs or steps shall be on 12-inch centers.

2. Rungs and steps shall be corrugated, knurled, dimpled coated with skid-resistant material, or otherwise treated to minimize the possibility of slipping.

3. The minimum width between side rails of a straight ladder or any section of an extension ladder shall be 12 inches.

4. The length of single ladders or individual sections of ladders shall not exceed 30 feet. Two-section ladders shall not exceed 48 feet in length and over two-section ladders shall not exceed 60 feet in length.

5. Based on the nominal length of the ladder, each section of a multi-section ladder shall overlap the adjacent section by at least the number of feet stated in the following:

Normal length of ladder (feet)	Overlap (feet)
Up to and including 36	3
Over 36, up to and including 48	4
Over 48, up to 60	5

6. Extension ladders shall be equipped with positive stops which will ensure the overlap specified in the table above.

6.2.6 Step ladders:

The length of a stepladder is measured by the length of the front rail. To be classified as a standard-length ladder, the measured length shall be within plus or minus one-half (½) inch of the specified length.

1. Stepladders shall not exceed 20 feet in length.
2. The bottoms of the four (4) rails are to be supplied with insulating non-slip material for the safety of the user.
3. A metal spreader or locking device of sufficient size and strength to securely hold the front and back sections in the open position shall be a component of each stepladder. The spreader shall have all sharp points or edges covered or removed to protect the user.

6.2.7 Ladder use near electrical equipment:

1. Safety-related work practices shall be employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized. The general rule is to maintain a distance of ten (10) feet from known energized electrical equipment. The specific safety-related work practices shall be consistent with the nature and extent of the associated electrical hazards.
2. Metallic or metal type ladders shall NOT be used around electrical energy, components and sources.
3. Portable ladders shall have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized parts.

6.3 Scaffolding Safety Guidelines

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

6.3.1 Program Objective:

To provide information pertaining to the erection, use, and dismantling of scaffolding to prevent injuries and incidents.

6.3.2 Program Management:

The Jack Moore Associates, Inc. Scaffolding Safety Guidelines shall be managed by Peter E. Michaud who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.

6.3.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Scaffolding Safety Guidelines. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

6.3.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

6.3.5 Training:

Serious injury or death can result from your failure to familiarize yourself, and comply with all applicable safety requirements of federal, state and local regulations and these safety guidelines before erecting, using, or dismantling scaffold systems. Therefore, employees shall not be required to work on any elevated work platforms prior to required training. Training shall be implemented by the program manager(s). Training shall include all possible hazards of working on scaffolding including fall protection, electrical hazard awareness, scaffolding load capability and falling objects.

Retraining is required where changes at the worksite present a hazard about which an employee has not been previously trained; or where changes in the types of scaffolds, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been previously trained; or where inadequacies in an affected employee's work involving scaffolds indicate that the employee has not retained the requisite proficiency.

ERECTION OF SCAFFOLD

6.3.6 Prior to Erection-All Scaffold Assemblies

- Jobsite shall be inspected to determine ground conditions or strength of supporting structure, and for proximity of power lines, overhead obstructions, wind conditions, the need for overhead protection or weather protection covers. These conditions must be evaluated and adequately provided for.

- Frame spacing and mud sill size can only be determined after the total loads to be imposed on the scaffold and the strength of the supporting soil or structure are calculated and considered. This analysis must be done by a qualified person. Load carrying information on components are available from the manufacturer,

- Stationary scaffolds over 125 feet in height and rolling scaffolds over 60 feet in height must be designed by a professional engineer.

- All equipment must be inspected to see that it is in good working condition and is serviceable. Damaged or deteriorated equipment shall not be used.

- Wood plank should be inspected to see that it is graded for scaffold use, is sound and in good condition, straight grained, free from saw cuts, splits and holes. (not all species and grades of lumber can be used as scaffold plank. Wood planks used for scaffolding must be specifically graded for scaffold use by an approved grading agency.)

- The scaffold assembly must be designed to comply with local, State, and Federal safety requirements.

6.3.7 Erection of Fixed Scaffold

- Scaffold must be erected, moved, or disassembled only under the supervision of qualified persons. Hard hats must be worn by all persons erecting, moving, dismantling, or using scaffolding.

- Mud sills must be adequate size to distribute the loads on scaffolding to the soil or supporting structure. Special care is needed when scaffold is to be erected on fill or other soft ground or on frozen ground. Sills should be level and in full contact with the supporting surface.

- Base plates or screwjacks with base plates must be in firm contact with both the sills and the legs of the scaffolding. Compensate for uneven ground with screwjacks with base plates. DO NOT USE unstable objects such as blocks, loose bricks, etc.

- Plumb and level scaffold until connections can be made with ease. Do not force members to fit. Be sure scaffold stays level and plumb as erection progresses.

- Ties, guys, bracing and/or outriggers may be needed to assure a safe stable scaffold assembly. The height of the scaffold in relation to the minimum base width, wind loads, the use of brackets, or cantilevered platforms and imposed scaffold loads determines the need for stability bracing. The following general guides are minimum requirements:

    ■ Federal OSHA requires that scaffolding must always be secure when the height of the scaffold exceeds four (4) time the minimum base width.
    ■ The bottom tie must be placed no higher than four (4) times the minimum base width and every 26 feet vertically thereafter. Ties should be placed as close to the top of the scaffold as possible and, in no case, less than four (4) times the minimum base width of the scaffold at the top.
    ■ Vertical ties should be placed at the ends of scaffold runs and at no more than 30-foot horizontal intervals in between.
    ■ Ties should be installed as the erection progresses and not removed until the scaffold is dismantled to that height.
    ■ Side brackets, cantilevered platforms, pulleys or hoist arms and wind conditions introduce overturning and uplift forces that must be considered and accounted for. These assemblies may require additional bracing, tying, or guying.
    ■ Circular scaffolds erected completely around or within a structure may be restrained from tipping by the use of “standoff” bracing members.
    ■ Each leg of a free-standing tower must be guided at the intervals outlined above or otherwise restrained to prevent tipping or overturning.

- Work platforms must be fully planked either with scaffold graded solid sawn or laminated plank, in good condition, or with fabricated platforms in good conditions.

    ■ Each plank must overlap the support by a minimum of 6 inches or be cleated
    ■ Plank should not extend beyond the support more than 18 inches. Such overhangs should be separated from the work by guard railing so that they cannot be walked on.
    ■ Plank on continuous run runs must extend over the supports and overlap each other bay at least 12 inches.
    ■ Spans of full thickness, 2 inches by 10 inch scaffold grade planks, should never exceed 10 feet. Loads on plank should be evenly distributed and not exceed the allowable loads for the type of plank being used. No more than one person should stand on an individual plank at one time.
    ■ Planks and/or platforms should be secured to scaffolding when necessary to prevent uplift of displacement because of high winds or other job conditions.

- Guardrails must be used on all open sides and ends of scaffold platforms. Both top and midrails are required. Local codes specify the minimum heights where guardrails are required, however, use at lower heights if falls can cause injury.

- Toeboards are required whenever people are required to work or pass under or around the scaffold platform.

- Access must be provided to all work platforms. If it is not available from the structure, access ladders, frames with built-in ladders, or stairways must be provided. When frames with built-in ladders are used, cleated plank or fabricated plank must be used at platform levels to minimize or eliminate platform overhang. Access ladders must extend at least three (3) feet above platforms.

- Side and end brackets are designed to support people only. Materials should never be placed on cantilevered platforms unless the assembly has been designed to support material loads by a qualified person. (These types of platforms cause overturning and uplift forces which must be compensated for. All frames should be fastened together to prevent uplift and overturning moment compensated for with counterweights or adequate ties.)

- Putlogs must never be used for the storage of materials. They are designed for personnel use only. Special care should be taken when putlogs are used.

    ■ Putlogs should overhang the support points by at least six inches. Use putlogs hangers with bolts fastened to support putlogs on frames.
    ■ Putlog spans of greater than 12 feet require knee bracing and lateral support.

- Putlogs used as side or end brackets need special bracing.

- Bridging between towers should not be done with one plank or stages unless the assembly is designed by a qualified person and overturning moments have been compensated for.

- Scaffold should not be used as material hoist towers or for mounting derricks unless the assembly is designed by a qualified person.

- Check the erected assembly before use. A qualified person shall thoroughly inspect the completed assembly to see that it complies with all safety codes, that nuts and bolts are tightened, that it is level and plumb, that work platforms are fully planked, that guardrails are in place and safe access is provided.

6.3.8 Erection of Rolling Scaffolds

- Height of the tower must not exceed four (4) times the minimum base dimension. Outrigger frames or outrigger units on both sides of the tower may be used to increase the base width dimension when necessary.

- All casters must be secured to frame legs or screwjacks with a nut and bolt or other secure means. Total weight of the tower should not exceed the capacity of the casters.

- Screwjacks must not be extended more than 12 inches above caster base. Tower must be kept level and plumb at all times.

- Horizontal/diagonal bracing must be used at the bottom and top of the tower and at intermediate levels of 20 feet. Fabricated planks with hooks may replace the top diagonal brace.

    - All frames must be fully cross braced
    - Only prefabricated plank or cleated plank should be used.

- Casters must be locked at all times the scaffold is not being moved.

USE OF SCAFFOLDS

6.3.9 All Scaffolds

- The Competent Person shall inspect the scaffold before each use to see that it is assembled correctly, that it is level and plumb, base plates are in firm contact with sills, bracing is in place and connected, platforms are fully planked, guardrails are in place, safe access is provided, that it is properly tied and/or guyed and that there are no overhead obstructions or electric lines within 12 feet of the scaffold assembly. If defective or damaged components are discovered during inspection, the scaffold shall be tagged as dangerous and not used until such repairs are made to provide a safe work platform.

- Use only the safe means of access that is provided. Do not climb bracing or frames not specifically designed for climbing. If such access is not provided, insist that it is provided.

- Climb Safely

    - Face the rungs as you climb up or down.
    - Use both hands.
    - Do not try to carry materials while you climb.
    - Be sure of your footing and balance before you let go with your hands. Keep one hand firmly on frame and ladder at all times.

- Do not work on slippery rungs to avoid slipping.

- Do not overload platform with materials.

- Working heights should not be extended by planking guardrails or by use of boxes or ladders on scaffold platforms.

- Do not remove any component of a completed scaffold assembly except under the supervision of a qualified person. Any component that has been removed should be immediately replaced.

6.3.10 Rolling Towers All of the above precautions plus:

- Do not ride manually propelled rolling scaffold. No personnel should be on the tower while it is being moved.

- Lock all casters before getting on the tower.

- Work only within the platform area: do not try to extend overhead work area by reaching out over guardrail.

- Do not bridge between two rolling towers with plank or stages.
- Secure all materials before moving scaffolds.
- Be sure floor surface is clear of obstructions or holes before moving scaffold.
- Be sure there are no overhead obstructions or electric power lines in the path of rolling scaffold.
- Rolling towers must only be used on level surfaces.
- Move rolling towers by pushing at the base level only. Do not pull from the top.

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6.4 Aerial Lift Safety Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

6.4.1 Program Objective:

It is the policy of Jack Moore Associates, Inc. to permit only trained and authorized personnel to operate aerial lifts. This policy is applicable to both daily operators and those who occasionally use an aerial lift. Employees will not use customer's equipment unless certified operators are given permission from the appropriate personnel.

6.4.2 Scope:

All individuals, including but not limited to employees, management and visitors, while performing work on jobsites or within our facilities

6.4.3 Objectives:

The objectives of the Aerial Lifts Safety Program include:

All aerial lifts shall be designed and constructed in conformance with applicable requirements of the American National Standards for "Vehicle Mounted Elevating and Rotating Work Platforms".

To ensure that operators understand the limitations and safe operations of the equipment.

To ensure that all equipment is properly maintained and is kept good working order.

To ensure that equipment malfunctions are noted before accidents occur.

To ensure that non-qualified employees do not use this equipment.

To ensure that qualified trainers are available to certify new operators and conduct refresher training.

To ensure any part of the equipment or load maintains a minimum distance of ten feet from all energized electrical equipment or lines rated 50 kV or below.

6.4.4 Competent person:

A competent person will be selected to oversee the aerial lift being used. The competent person also inspects all aerial lifts per the manufactures safety checks before each use. The competent person must have a complete grasp of functions, rules, and regulations as they pertain to the aerial lift he/she oversees. Competent persons will manage the daily activities on and around aerial lifts and ensure the following:

Fall protection - Basket occupants must wear a body harness or body belt in a fashion so that the occupant is restrained from falling from the basket. Fall restraint lanyards must be attached to the basket or boom.

Moving the lift - The lift must not be moved when the boom is elevated in a working position unless the lift is specifically designed to do so.

Lift controls - Lift controls must be tested daily prior to operating the boom.

Backup alarms – Audible and visual alarms must be tested and in working order before each use or a spotter may be used in the event of an alarm malfunction.

Boom and basket loads - The manufacturer's boom and basket maximum intended loads must not be exceeded.

Outriggers and brakes - Outriggers must be positioned on pads or solid ground when used. Brakes must be set anytime outriggers are used. Wheel chocks must be installed before the lift is used when working on an incline.

Barricades & signs - The area beneath an operating aerial lifts must be cordoned off and access to that area must be restricted. Restricting access may be accomplished through the use of barricades and signs.

6.4.5 Training:

Aerial lifts are considered any of the following: vehicle-mounted aerial devices to elevate personnel to work areas not accessible from the ground; extendible boom platforms, aerial ladders, articulating booms, vertical towers, and a combination of any such devices. All employees who may on occasion work on aerial platform must be trained. Training covers the proper use, inspection of, and hazards associated with aerial lifts.

Aerial lifts may be modified for uses other than those intended by the manufacturer provided the modification has been certified in writing by the manufacturer.

6.4.6 Working on lifts:

Fall protection - Basket occupants must wear a body harness or body belt in a fashion so that the occupant is restrained from falling from the basket. Fall restraint lanyards must be attached to the basket or boom. Also, personnel will stand firmly on the floor of the lift and will not climb on the side rails or the edge of the basket.

Moving the lift - The lift must not be moved when the boom is elevated in a working position unless the lift is specifically designed to do so.

Lift controls - All controls must be tested daily prior to operating the boom.

Boom and basket loads - The manufacturer's boom and basket maximum intended loads must not be exceeded.

Outriggers and brakes - Outriggers must be positioned on pads or solid ground when used. Brakes must be set anytime outriggers are used. Wheel chocks must be installed before the lift is used when working on an incline.

Barricades & signs - The area beneath an operating aerial lifts must be cordoned off and access to that area must be restricted. Restricting access may be accomplished through the use of barricades and signs.

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Jack Moore Associates, Inc.
Prime Drilling, Sawing, and Anchoring div.
7.1 Electrical Safety
Assured Equipment Grounding Conductor Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

7.1.1 Program Objective:

It is our objective to design and implement an Electrical Safety and Assured Equipment Grounding Conductor Program as described in 29CFR 1926.404 (b) (1) iii, to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to electric shock in the workplace. Employees who may be at risk of electric shock, who are not qualified to work on energized electrical equipment, shall be trained to recognize those risks and be familiar with related safety practices pertinent to their work assignments. All employees, qualified or not, must adhere to the clearance distances from energized lines and equipment as described in this program. It is not only our goal to prevent electric shock incidents, but to eliminate potential electrical hazards.

Jack Moore Associates, Inc. requires all employees to use Ground Fault Circuit Interrupters on all equipment and temporary wiring, making the need for the AEGCP unnecessary. However, all Prime employees have been trained on the AEGCP and the reasons for having one in place.

Safe work practices intended to protect employees exposed to direct or indirect contact with electricity shall be employed. Employees working on or near equipment that may be energized and not locked out, who may receive an electrical shock, shall treat the equipment as live equipment and adhere to the safe work practices put in place.

7.1.2 Program Management:

The Jack Moore Associates Electrical Safety Program shall be managed by Peter E. Michaud who shall be responsible for:

(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.

(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(f) File appropriate reports with respective governmental authorities.

The program manager or assistant manager shall act as “Competent Person” in all regards to the Electrical Safety Program. “Competent Person” is one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

7.1.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers(s) of the Jack Moore Associates Assured Equipment Grounding Conductor Program. The Assistant Program Managers(s) shall act as “Competent Person” in all regards to the Assured Equipment Grounding Conductor Program Together they shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Managers.

7.1.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc. These should be submitted in writing to the Program Manager or the Program Assistant Manager(s) who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

7.1.5 Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to Understand"** station in each branch, and all employees shall be notified of its location.

7.1.6 Planning:

In addition to the required use of Ground Fault Circuit Interrupters (GFCI), Jack Moore Associates, Inc. is not adopting an Assured Equipment Grounding Conductor Program. However, all affected employees shall be trained to understand how the program covering all cord sets, receptacles which are not part of the building or structure (temporary wiring), and equipment connected by cord and plug which are available for use or used by employees.

1. A copy of this program shall be kept at the workplace for inspection and copying by the Assistant Secretary and any affected employee.
2. Each cord set, attachment cap, plug and receptacle of cord sets, and any equipment connected by cord and plug, except cord sets and receptacles which are fixed and not exposed to damage, shall be visually inspected before each day's use for external defects, such as deformed or missing pins or insulation damage, and for indications of possible internal damage. Equipment found damaged or defective shall be removed from service immediately for repair or repaired and tested for proper function.
3. All equipment grounding conductors and cord set grounding conductors shall be tested for continuity and be electrically continuous. This is required for all plug connected equipment required to be grounded and all cord sets and receptacles which are not part of the permanent wiring of the building or structure.
4. Each receptacle and attachment cap or plug shall be tested for the correct attachment of the equipment grounding conductor. The equipment grounding conductor shall be connected to its proper terminal.
5. The aforementioned required tests shall be performed before first use of new equipment and at intervals not to exceed 3 months, before equipment is returned to service following repairs, and before equipment is used after any incident which can be reasonably suspected to have caused damage (for example, when a cord set has been run over or when something has fallen on the cord set possibly causing internal damage.
6. Employees are prohibited from the use of any equipment or temporary wiring, including cord sets as described in this program that has not met the requirements of this Electrical Safety Program.
7. The tests performed as set forth in this Electrical Safety Program shall be recorded. This test record shall identify equipment by company controlled serial numbers and shall include test date, last date tested, and dates of any repairs made to said equipment. This test record shall be a log as set forth at the end of this written program and shall be made available for inspection by the Assistant secretary and any affected employee.

7.1.7 Company Policy:

Unauthorized employees are prohibited from working on or near exposed energized electrical equipment or overhead power lines whether on the ground or on an elevated work platform. De-energized equipment and overhead lines shall be treated as energized. For voltages less than 50kV, a distance of ten feet must be maintained from these electrical hazards. For voltages in excess of 50kV, a distance of ten feet must be maintained plus 4 inches for every 10kV over 50kV. Only qualified individuals shall be allowed to work on exposed sources of electricity adhering to the approach distances specified in Table S-5:

Voltage range (phase to phase)	Minimum approach distance
300V and less	Avoid Contact
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm).
Over 750V, not over 2kV	1 ft. 6 in. (46 cm).
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm).
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm).
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm).
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm).
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm).

When working near overhead power lines, employees are required to maintain a safe distance of ten feet or more from these lines. If work must be performed closer than ten feet, the lines shall be de-energized and grounded. The ten-foot rule also applies to any equipment that may be used near power lines such as ladders or vehicles. Refer to "Ladder Program" of this manual for further information about safe ladder use.

Access equipment (ladders), shall be non-conductive, fiberglass, Type 1AA or Type 1A only and shall be maintained in a clean and dry condition to assure their non-conductivity.

Employees are prohibited from the use of any equipment or temporary wiring, including cord sets as described in this program that has not met the requirements of this Electrical Safety Program. Any equipment found to be defective shall be considered a hazard and dangerous to the employees. Such equipment shall be removed from service immediately and marked for repair or repaired and tested before being returned to service.

Employees are forbidden to splice cord sets, use or attempt to use cord sets that have been spliced. An approved male and/or female cord end shall be used on the appropriate end of all cord sets and tested and evaluated by the Competent Person before being returned to service.

Cord sets shall be protected from external forces that may cause damage to the cord set and thereby endangering the employee(s). Cord sets shall not be laid out in a fashion that exposes the cord set to vehicle traffic or foot traffic, creating a trip hazard. Cord sets shall be suspended in a fashion that protects the cord from damage.

When employees are exposed to de-energized equipment or circuits, the equipment or circuits shall be locked out, tagged out, or both. Refer to the JMA Lock-Out Tag-Out Program. This applies to work performed on exposed live parts, where possible direct or indirect contact could be made, or near enough to the exposed parts to pose a hazard to the employees.

Only qualified employees may perform work on parts that have not been de-energized and only after it is determined by the Competent Person that de-energizing is not possible. The qualified person shall be made familiar with the use of special techniques, tools. PPE, and insulating shields and materials. Clothing, equipment worn on the body or jewelry that may be conductive shall not be worn near energized parts unless made non-conductive by insulating, wrapping, or covering. For example, a full body harness with metal buckles and hardware shall be replaced with a non-conductive harness. It is preferred that jewelry be removed during these operations.

Where an employee must enter an area or confined space containing exposed energized electrical equipment, proper illumination shall be provided in order to work safely. Employees are not allowed to enter such areas without proper illumination. Employees exposed to energized parts in these areas shall be protected by insulation, protective shields, or protective barriers.

7.1.8 Disciplinary Action:

A written warning will be issued for the first safety violation. Removal from the project and loss of safe hours without pay will be imposed. The disciplinary action may vary with the severity of the violation. Supervisors who knowingly allow such a violation are subject to the same disciplinary action.

If a second safety violation occurs after a six-month period has passed, the disciplinary action will be treated as a first violation. If a second violation occurs within a six-month period, the employee will be immediately discharged, subject to rehire after 30 days. After a safety violation discharge, the Safety Officer(s) must approve any rehire after an interview with the considered employee.

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7.2 Lockout/Tagout Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

7.2.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the importance of lockout/tagout procedures when performing maintenance on equipment or circuits.. It is our goal to provide full information and training to each employee in order to assure the safest possible working conditions.

7.2.2 Program Management:

The Jack Moore Associates, Inc. Lockout/Tagout Program shall be managed by Peter E. Michaud, who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.
7. Handle all requests for Safety Data Sheets (SDS) and chemical listings on a timely basis.
8. The procedures addressed in this document shall be evaluated and reviewed at least annually by the program manager. Work areas shall be inspected at least annually by the program manager to insure safety and that rules are being followed.

7.2.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Lockout/Tagout Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

7.2.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc.. These should be submitted in writing to the Program Manager who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

7.2.5 Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to understand"** station in each location, and all employees shall be notified of its location.

7.2.6 General Lockout/Tagout Rules :

Whenever an employee must come in contact with parts of fixed electrical equipment or circuits, the equipment must be “locked out”, “tagged out” or both, to prevent accidental energizing of the equipment and exposing the employee to a hazard. Before any service or maintenance is performed on any powered equipment, the equipment must be stopped. All sources of energy must be disconnected and all energy devices locked out until the service and/ or maintenance is completed. Generally we think of electricity when we think of LOTO, but ALL SOURCES of energy must be controlled, including, but lot limited to, electrical energy, pneumatic energy, hydraulic energy, mechanical energy, tension, compression, force of gravity, and steam.

7.2.7 Purpose:

The accidental or unexpected starting of any machinery, electrical circuit, or electrical equipment can cause injury or death. The following procedures must be observed whenever an employee is exposed to contact with equipment or circuits that have been de-energized. The circuits energizing this equipment must be locked out, tagged out, or both, in accordance with these procedures.

Before any inspections are made on electrical equipment, power must be turned off at the switch box and the switch locked in the OFF position (locked out). The switch or controls must be securely tagged to show that the equipment is being worked on (tagged out).

Machinery being inspected or worked on must be isolated from all potentially hazardous energy sources. The machinery must also be free from residual or accumulated energy before employees may perform any service or maintenance activities. Unexpected release of stored energy has the potential to cause injury.

7.2.8 Compliance and responsibility:

All employees are required to comply with the restrictions and limitations imposed upon them during the lockout. Employees are required to perform the lockout according to this procedure. Employees must not attempt to start, use, or energize a machine, circuit, or equipment when it is locked out.

Only authorized employees may lock out or tag out machines or equipment and those authorized employees will be identified on each "Hazardous Energy Control Procedure" form. Affected employees and any other employees whose work operations are or may be in the area, will be instructed in the purpose and use of the lockout/ tagout procedures.

Affected employees will be notified by the authorized employees whenever a lockout or tagout will occur, as well as when the equipment is being placed back in service. It is the responsibility of management to approve all Hazardous Energy Control Procedures. Approvals may be given by the Safety Program Manager or the Assistant Manager(s).

7.2.9 Training:

Training of authorized employees will include:

1. Review of the requirements of 29 CFR 1910.147, Control of Hazardous Energy.
2. Review of the requirements of 29 CFR 1926.417; sub-part K Electrical.
3. Observation of types and magnitude of energy sources.
4. Limitations of "tagout".
5. Lockout procedures for the isolation of energy sources.
6. Procedures for removing lock or tags.
7. Procedures for restoration of energy.

Retraining will be provided whenever there is a change in the job assignment, whenever there is a change in equipment or processes that may create a new hazard, or whenever a change occurs in the Jack Moore Associates, Inc Hazardous Energy Control Procedures. Training records shall be documented and signed by the program manager.

7.2.10 Preparation for Lockout or Tagout:

Obtain proper Hazardous Energy Control Procedure for equipment, circuit, or machine to be locked out or tagged out.

Identify all affected employees by name (or job title) who may be involved in the lockout/ tagout.

7.2.11 Lockout/Tagout Procedure:

All equipment and circuits will be locked out or tagged out in accordance with the following procedure to protect against accidental or inadvertent operation when operation could cause injury to personnel. Procedures are evaluated periodically to assure requirements are being met.

1. Notify all affected employees that a lockout or tagout system is going to be used and the reason for it. The authorized employee will know the type and magnitude of energy that the machine or equipment uses and will understand the associated hazards.
2. Disconnect (de-energize) the circuits and equipment on which work will be done from all electric energy sources.
3. Combination locks are prohibited for use in any lockout of machines or equipment. Control circuit devices (e.g., push buttons, selector switches, and interlocks.) may not be the only means of de-energizing circuits or equipment. Interlocks for electric equipment may not be used as a substitute for lockout or tagout procedures.
4. Stored electric energy that might harm personnel must be released. If personnel might be endangered, then capacitors must be discharged, and high capacitance elements must be short-circuited and grounded.
5. When stored in devices that could re-energize electric circuit parts, non-electric energy must be blocked or relieved to prevent accidental re-energizing.

7.2.12 Lock and Tag Required Rule:

1. Place a lock and tag on each disconnecting means used to de-energize circuits and equipment on which work is to be performed. Lockout and tagout the energy isolating devices with assigned individual locks and tags. Lock and tags must bear the name of the worker they were assigned to.
2. Attach the lock to prevent persons from operating the disconnecting means unless they resort to undue force or use of tools.
3. Make sure each tag has a statement that prohibits unauthorized operation of the disconnecting means and removal of the tag.
4. Attach tags at all points where equipment or circuits can be energized to plainly identify the equipment or circuits being worked on.
5. Do not attempt to operate any switch, valve, or energy isolating device when it is locked out or tagged out.

7.2.13 Use of Tag Without Lock:

A tag may be used without a lock, only if both of the following conditions are satisfied:

1. A lock cannot be applied, or an equivalent level of safety can be obtained without use of a lock.
2. At least one additional safety measure is used to provide a level of safety equal to a lock. (Examples: removal of isolating circuit element, blocking of a controlling switch, or opening of an extra disconnecting device.

7.2.14 Use of Lock Without a Tag:

A lock may be placed without a tag, only if all the following conditions are satisfied:

1. The lockout period does not extend beyond the work shift.
2. Only one circuit or piece of equipment is de-energized.
3. Employees exposed to hazards of re-energizing the circuit or equipment are familiar with the procedure.

7.2.15 Verification of De-energized Circuit or Equipment:

Before any circuits or equipment can be considered de-energized and worked on, a qualified person must check the equipment operating controls to verify that the equipment cannot be restarted and use test equipment to check the equipment's circuit elements and electrical parts to verify that they are de-energized. Determine from the test if any inadvertently induced voltage or unrelated voltage back feed has caused an energized condition. Check the test equipment for proper operation immediately after the above test if the circuit tested is over 600 volts, nominal.

> **Caution**: Return operating controls to the neutral or off position after the test.

The equipment and circuits are now locked out and/or tagged out.

7.2.16 Re-energizing Equipment:

The following requirements must be met, in the order given, before equipment or circuits can be (even temporarily) re-energized.

1. Check all tools, electrical jumpers, shorts, grounds, and similar devices to verify their removal so that equipment and circuits can be safely energized. A qualified person must do this check.
2. Warn employees to stay clear of the equipment or circuits.

3. Remove each lock and tag by or under the supervision of the employee who put it there. (Exception: The lock or tag may be removed by a qualified person if:
    a. The qualified person is designated to perform the task.
    b. The employee who applied the lock or tag clearly is unavailable at the workplace; and
    c. The employee knows of the lock or tag removal before resuming the work.

4. Check to see that all the employees are clear of the circuits and equipment.
5. Ensure that all guards have been reinstalled.
6. Remove lockout/tagout devices and operate the energy isolating devices to restore energy to the machine or equipment.

7.2.17 Group Procedure:

Before any group lockout/tagout is implemented, this procedure will be reviewed with all personnel affected by or authorized to implement the group lockout/tagout event:

1. One authorized employee will coordinate the lockout/tagout procedure for all group lockout/tagout events.
2. Each employee will affix his or her lock to the equipment being serviced or having maintenance performed on it.
3. No employee will be allowed to remove other employees lock or tag. Each employee will remove his or her lock or tag when their part of the operation is completed.
4. When service or maintenance will involve more than one shift, members of the off-going shift will remove their locks and/or tags as the members of the on-coming shift apply their locks and/or tags.
5. When equipment has room for only one lock, the coordinator of the procedure will place the lock on the equipment and place the key in a cabinet or box. Each employee will then affix his or her lock to the cabinet or box

7.2.18 Procedural Review:

Periodic inspections of the lockout/tagout procedure shall be conducted by the program manager to ensure the procedures are being followed. The procedure inspection shall be conducted at least annually, but as deemed necessary by the program manager. The review shall include verification of understanding by all employees involved in the procedure and verification of proper use of equipment used in the procedure. Procedural inspections shall be documented, and a file maintained at the main office.

Jack Moore Associates, Inc.
Prime Drilling, Sawing, and Anchoring div.
8.1 Fire Prevention Plan

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

8.1.1 Program Objective:

It is our objective to design and implement a fire prevention program, an emergency action plan, to inform and train each full or part time, permanent or temporary employee or sub-contractor on the importance of maintaining a safe work environment. It is our goal to provide full information and training to each employee in order to assure the safest possible working conditions.

8.1.2 Program Management:

The Jack Moore Associates, Inc. Fire Prevention Plan Program shall be managed by Peter E. Michaud, who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.
7. Handle all requests for Safety Data Sheets (SDS) and chemical listings on a timely basis.

8.1.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Fire Prevention Plan Program. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Managers. Mark Lannon has been trained to perform the monthly inspection of fire extinguishers.

8.1.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc. These should be submitted in writing to the Program Manager who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

8.1.5 General Safety Rules:

Smoking is strictly prohibited within the premises of Jack Moore Associates, Inc. regardless of the presence or lack of flammable or combustible materials. The designated smoking area is outside the building at the employee entrance. A receptacle has been provided for smoking materials.

For those employees who may handle flammable liquids such as gasoline for powered equipment, special bonding or grounding wires have been provided to eliminate the possibility of static electricity causing an explosion. Refer to the memo dated October 30, 2002. Long term storage of these fuels should be done in the grounded yellow cabinet on the loading dock labeled "FLAMMABLE- KEEP FIRE AWAY".

For those employees using the brazing equipment, keep all combustible and flammable materials away from the brazing area. A hazard assessment should be conducted before any brazing activities begin. For long term storage of the fuel and oxygen tanks, they must be kept a minimum of 20 feet apart or separated by a fireproof barrier. Tanks on their transportation cart connected to their hoses are considered in use, not in storage.

All employees should be aware of the location of fire extinguishers in the building and the vehicles. Fire extinguisher location maps can be found in numerous locations throughout the facility. Fire extinguishers are inspected monthly and checked and recharged or replaced on an annual basis by an outside fire protection contractor. Our extinguishers are serviced each June. If any employee discharges an extinguisher or notices the gauge in the red, recharge area, it should be brought to the attention of the safety program manager or assistant managers for corrective action.

Type **ABC** dry powder extinguishers may be used on **Type A** combustible materials such as wood, paper, and trash. They may also be used **Type B** flammable liquids such as, gasoline, oil, or paint. **Type C** fires are live equipment electrical fires and may also be extinguished with an **ABC** extinguisher. DO NOT USE an ABC extinguisher on cooking grease fires.

When it comes to the operation of a fire extinguisher. remember the word **PASS** which stands for: **P**ull the pin, **A**im at the base of the fire, **S**queeze the handle, **S**weep from side to side.

Carbon Dioxide extinguishers discharge CO2 as a gas at very cold temperatures and displaces oxygen to extinguish the flame. Care should be taken not to use CO2 extinguishers in confined areas. Also avoid contact with the skin as "cold burns" could result.

All employees are responsible for good housekeeping. Never allow combustible materials to accumulate in an unsafe manner. Dispose of oily rags properly and keep work areas clean and organized.

Training shall consist of, but shall not be limited to classroom, toolbox talks, on the job, and on-line. Training shall be conducted prior to initial assignment and at least annually thereafter

8.1.6 Emergency Action/Evacuation Plan.

In the event of a fire at our facility, a small fire may be extinguished with one or more of our extinguishers. Employees are urged to avoid playing hero with a larger fire. Instead, alert all other employees and evacuate the building. If possible, call 911 from a cell phone **outside of the building**. All employees shall meet at a predetermined spot in the parking lot so we may determine if all personnel has been safely evacuated from the building. Our meeting spot shall be in front of the building at the chain link gate at 13 McCracken Rd., Millbury, MA. Meeting places at construction sites shall be determined prior to the commencement of work at these sites and included in the site specific task plan. Managers and assistant managers shall have telephone numbers stored in their cell phones to alert other companies occupying the facility.

Inspection Record (Sample)

Date	Location	Type	OK Yes/No
	Employee entrance	ABC	
	Shipping	ABC	
	Office hallway	ABC	
	Showroom	ABC	
	Prime Garage	ABC	
	Repair/Shop	ABC	
	Spare	ABC	
	Spare	ABC	
	Employee entrance	ABC	
	Shipping	ABC	
	Office hallway	ABC	
	Showroom	ABC	
	Prime Garage	ABC	
	Repair/Shop	ABC	
	Spare	ABC	
	Spare	ABC	
	Employee entrance	ABC	
	Shipping	ABC	
	Office hallway	ABC	
	Showroom	ABC	
	Prime Garage	ABC	
	Repair/Shop	ABC	
	Spare	ABC	
	Spare	ABC	
	Employee entrance	ABC	
	Shipping	ABC	
	Office hallway	ABC	
	Showroom	ABC	
	Prime Garage	ABC	
	Repair/Shop	ABC	
	Spare	ABC	
	Spare	ABC	
	Employee entrance	ABC	
	Shipping	ABC	
	Office hallway	ABC	
	Showroom	ABC	
	Prime Garage	ABC	
	Repair/Shop	ABC	
	Spare	ABC	
	Spare	ABC	

8.2 Compressed Gas Safety Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

8.2.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to compressed gas cylinder accidents. It is not only our goal to prevent these incidents, but to eliminate all potential compressed gas cylinder hazards.

8.2.2 Requirements:

Each employee required to use compressed gas cylinders shall receive the proper training on such equipment. Training shall be conducted by the competent person or supervisor. All manufacturer's instructions shall be understood and followed.

8.2.3 Storage:

Compressed gas cylinders shall be stored in an upright position at all times.

When not in use, oxygen tanks shall be stored at least twenty (20) feet from fuel cylinders or separated by a non-combustible barrier with a fire fating of at least one-half hour.

Tanks on a welding cart with a regulator and hoses attached are considered "IN USE", not in storage.

8.2.4 Use and handling:

Cylinders must be kept far enough away from the work area so no sparks, hot flames, or slag will come in contact with them.

Cylinders containing oxygen or fuel must never be taken into a confined space.

The valve end of the cylinder must always be up when in use.

Cylinders, whether empty or full, should never be used for any purpose other than intended by the gas supplier.

The contents of the cylinder shall only be used for it's intended purpose.

Only the gas supplier shall attempt to fill or mix gasses in the cylinder.

Never use a damaged cylinder.

Quickly open and close the valve on a cylinder before attaching the regulator. This will clear away any dirt that might be in the valve.

After attaching the regulator, open the valve slowly to prevent damage to the regulator.

The valves on gas cylinders shall not be opened more than 1 1/2 turns. This will allow the user to shut them off quickly in case of an emergency.

8.2.5 Transportation:

Valve protection caps shall be in place and secured.

When hoisting cylinders, they shall be secured to a cradle, sling board, or pallet. Cylinders shall not be hoisted by the use of a magnet or sling.

Cylinders shall be moved by tilting them and rolling on the bottom edge.

When transported by vehicle, cylinders shall be secured in a vertical position.

8.3 Welding and Cutting Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 27, 2021

8.3.1 Program Objective:

The purpose of this program is to prevent the potential for fires, explosions, and/or the release of toxic gasses from welding, cutting, soldering, or brazing activities.

8.3.2 Scope:

This program applies to all hot work performed by employees of Jack Moore Associates, Inc. and subcontractors. Hot work is defined as any activity that causes the release of heat including, but not limited to, welding, cutting, brazing, or soldering of objects, building materials, or structural members.

8.3.3 Qualifications:

Supervisors, welders, braziers, and cutters shall receive the appropriate training for the safe operation of all hot work equipment.

Fire watchers shall be suitably trained in recognizing potential for development of a fire as a result of the hot work being performed. Fire watchers shall also be suitably trained in the operation of fire extinguishers and fire suppressant materials.

Supervisors, Fire watchers and operators shall also be trained and familiar with the facility for location of fire extinguishers and sounding an alarm in the event of fire. They shall also be aware of evacuation procedures and routes for the facility.

8.3.4 Hot Work Permitting:

No hot work may be performed unless a Hot Work Permit has been signed and approved by a supervisor. This includes hot work performed by sub-contractors.

The entire area shall be inspected by the permitting supervisor prior to commencement of hot work.

The permitting supervisor must confirm that before the hot work takes place:

1. The object to be worked on can be located outside the facility if possible.
2. If moving the work is not possible, all combustible materials shall be moved away from the hot work area.

3. If combustible materials cannot be moved from the hot work area, they shall be covered with or guarded with fireproof material capable of confining sparks, heat and slag to protect the materials.

8.3.5 Fire watch:

Supervisors shall assign fire watchers for all hot work in which the potential exists for other than minor fire to develop as a result of the hot work being performed and shall ensure that such individuals are properly trained in their responsibilities and the use of fire extinguishing equipment.

Firewatchers shall be required whenever hot work is performed:

1. Within 35 feet of appreciable combustible materials.
2. Appreciable combustibles are more than 35 feet from the work, but are easily ignited by sparks or heat.
3. Wall or floor openings within a 35 foot radius of the hot work expose combustible materials in adjacent areas including concealed spaces in walls or floors.
4. Combustible materials are adjacent to the opposite side of metal partitions, walls, ceilings, or roofs, and are likely to be ignited by radiation or conduction.

Firewatchers shall maintain the watch for a minimum of a half hour after the hot work is completed. Fire extinguishers shall be in the immediate area during the fire watch.

8.3.6 Precautions:

Ventilation and/or exhaust systems shall be put in place to minimize the accumulation of toxic gasses, fumes, or dust produced by the hot work.

Operators must wear appropriate personal protective equipment.

Operators shall report any defective equipment or safety hazards to the supervisor. Defective equipment must be taken out of service until repairs can be made by a qualified person.

Safety hazards must be addressed before work can begin or resume.

Cutting and welding shall not be permitted in the following situations:

1. In any area of the building where fire suppression equipment is impaired.
2. In the presence of explosive atmospheres, including flammable gasses, vapors, liquids, or dusts.
3. In the presence of explosive atmospheres that may develop inside uncleaned or improperly prepared tanks or equipment which have previously contained such materials.

8.4 Emergency Action Plan

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

8.4.1 Program Objective:
To facilitate and organize employer and employee actions, including evacuations, during a workplace emergency. This program is designed for our main office location located at 13 McCracken Road, Millbury, MA. When our employees are in the field on jobsites, this plan will train them to be able to familiarize themselves with the same criteria contained in this plan for the location at which they are working.

8.4.2 Program Management:

The Jack Moore Associates, Inc. Emergency Action Plan shall be managed by Peter E. Michaud who shall be responsible for:
(a) Program implementation.
(b) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(c) Maintenance of complete and up-to-date records and documentation.
(d) Manage all questions and concerns regarding the program.
(e) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(f) File appropriate reports with respective governmental authorities.

8.4.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the. Jack Moore Associates, Inc. Emergency Action Plan. He shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

8.4.4 Program Updates:

We encourage comments and suggestions from all employees of Jack Moore Associates, Inc., These should be submitted in writing to the Program Manager or the Program Assistant Managers who will evaluate and act upon the submittal. In addition, this written plan shall be evaluated on a quarterly basis and updated as deemed necessary by the program management.

(A) It is the policy of this company to take every possible action to comply with all emergency regulations and protect employees in emergency situations.

(B) Pete Michaud is the person that is responsible for making sure that this emergency action plan is kept up to date, practices, and reviewed periodically.

(C) Reporting

Fire	911 or if on jobsite per instruction of owner or General Contractor.*
Explosion	911 or if on jobsite per instruction of owner or General Contractor.
Weather	911 or if on jobsite per instruction of owner or General Contractor.
Bomb Threat	911 or if on jobsite per instruction of owner or General Contractor.
Chemical Spill	911 or if on jobsite per instruction of owner or General Contractor.
Violence	911 or if on jobsite per instruction of owner or General Contractor.
Medical	911 or if on jobsite per instruction of owner or General Contractor.

*Refer to site specific plan if available.

(D) Evacuation Procedures

(E) Emergency Escape Procedures and Routes
Emergency escape procedures and route assignments have been posted in each work area, and all employees have been trained by supervisors in the correct procedures to follow. Consult with direct supervisor while on a jobsite for evacuation routes and procedures.

(F) Procedure for employees who remain to operate critical operations before they evacuate.
This does not apply to any employee while at the main office location or on a jobsite. All employees are to evacuate the building immediately in the event of an emergency.

(G) Employee accountability procedures after evacuations

Each supervisor is responsible for accounting for all assigned employees, personally or through a designee, by having such employees report to a predetermined designated rally point and conducting a head count. Each employee must be accounted for by name. All supervisors are to report their head count by name to the Emergency Evacuation Coordinator. The evacuation rally point for the main office is in the South parking lot out the loading dock exit area. Should that exit be impassable, use the East parking lot through the showroom door. Evacuation from the Prime garage area shall be by any of

the overhead doors or any of the previously listed exits. Rally points and evacuation procedures vary from jobsite to jobsite. Employees are to familiarize themselves with site specific routes and procedures before beginning work.

(H) Alarm System
The type of alarm at the main office is an audible horn accompanied by a strobe light in the event of a detected fire. Jobsite alarms vary in type and for different reasons. Employees are to familiarize themselves which each type of alarm and for what system it is giving warning for.

Action to be taken	**Alarm System**
Evacuate	Fire

(I) Sheltering
This does not apply to any employee while at the main office location or on a jobsite. All employees are to evacuate the building immediately in the event of an emergency.

(J) Training
Pete Michaud has been trained to assist in the safe and orderly emergency evacuation of other employees.

Training is provided for employees when:
1) The plan was initiated
2) Responsibilities change
3) New employees are hired or transferred
4) Once per year

(K) Fire Extinguishers
Some employees are trained in the use of fire extinguishers and are authorized to use them. However, the first action is to call 911 and determine the severity of the fire If the fire extinguisher capacity rating is not capable of extinguishing the fire, all employees are instructed to evacuate the building.

(L) Employee Accountability Procedures Following an Emergency Evacuation
Each supervisor is responsible for accounting for each assigned employee following an emergency evacuation. The following procedures apply:

1) Rally points have been established for all evacuation routes and procedures. These points are designated on each posted work area escape route.

2) All work area supervisors must report to their designated rally points immediately following an evacuation.

3) Each employee is responsible for reporting to his or her supervisor so that an accurate headcount can be made. Supervisors will check off the names of all those

reporting and will report those not checked off to the Emergency Evacuation Coordinator.

4) The Emergency Evacuation Coordinator will be in the South parking lot and if that egress was not able to be used, he will be in the East parking lot.

5) The Emergency Evacuation Coordinator will determine the method to be utilized to locate missing personnel in each situation.

(M) Rescue and Medical Duties

We shall rely on local resources to provide rescue and medical services.

9.1 Driver Safety Awareness Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

9.1.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee on the importance of driving safety. It is our goal to provide full information and training to each employee in order to assure the safest possible conditions behind the wheel of company vehicles, which we hope would be extended to personal vehicles also.

9.1.2 Program Management:

The Jack Moore Associates, Inc. Safe Work Environment Program shall be managed by Peter E. Michaud, who shall be responsible for:

1. Program implementation.
2. Employee training for existing and new personnel including temporary and contract personnel if applicable.
3. Maintenance of complete and up-to-date records and documentation.
4. Manage all questions and concerns regarding the program.
5. Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
6. File appropriate reports with respective governmental authorities.

9.1.3 Supporting Personnel:

Bruno Frongillo and Brian Pastor have been named Assistant Program Managers of the Jack Moore Associates, Inc. Safe Driver Awareness. They shall be responsible for handling all questions and requests in the absence of the Program Manager. Information regarding occupational hazards shall be readily available during all plant operating hours. All employees should be aware that they may request information at any time from either the Program Manager or the Program Assistant Manager.

9.1.4 Program Updates:

9.1.4.1 All vehicles must be maintained in safe working order and must display a current inspection sticker.

9.1.4.2 Employees must possess a valid and current driver's license in order to be permitted to operate any company vehicle. Only properly licensed operators are authorized to operate company vehicles.

9.1.4.3 Operation of company vehicles under the influence of alcohol, illegal drugs, or certain medications is prohibited. Refer to JMA drug policy, element 3.2 and 3.3 of this document.

9.1.4.4 Employees are prohibited from texting while driving company vehicles during hours of operation. Employees are encouraged to practice the same common-sense procedures when not on company time. Distracted driving causes accidents and fatalities. Employees are encouraged to pull over to the side of the road when making or receiving telephone calls.

9.1.4.5 Use of seat belts by the operator and all passengers is required in all company vehicles.

9.1.4.6 Company vehicles are monitored for speed violations by a GPS system. Employees shall observe and obey the speed limit and maintain a safe distance from other vehicles. Traffic violations and vehicle accidents must be reported to the office immediately.

9.1.4.7 Equipment carried to and from the jobsite must be secured in the bed of the vehicle to prevent shifting of the load during transport. This applies to vans as well as open truck beds. Do not overload the vehicle or trailer. Do not overload any vehicle or trailer. Vehicles must be of the correct size to accommodate the intended load.

9.1.4.8 The Jack Moore Associates, Inc. Safe Driver Awareness Program shall consist of distribution of valuable safety information to all employees, including employees who may not be required to operate company vehicles. This information shall be, but not limited to, articles from publications and/ or various sources on the internet. We encourage comments and suggestions from all employees of Jack Moore Associates, Inc.. Articles of interest found by any employee may be submitted to the program managers for evaluation and distribution.

Information Accessibility:

All employees shall have full access to the information contained in this Safe Driver Awareness Program. Past information may be obtained from the program manager.

9.2 Forklift and Powered Industrial Truck Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

9.2.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to the operation and maintenance of powered industrial trucks (PIT). It is not only our goal to prevent these incidents, but to eliminate all potential material handling hazards.

9.2.2 Purpose

Material handling is a significant safety concern. During the movement of products and materials there are numerous opportunities for personal injury and property damage if proper procedures and caution are not used. This chapter applies to all powered industrial tucks and lifting equipment. The information in this chapter shall be used to train prospective industrial truck operators and provide the basis for refresher training and retraining as deemed necessary. OSHA reference for Powered Industrial Trucks is 1910.178.

Responsibilities

9.2.3 Management

Management shall provide adequate training in safe operation of all equipment used to move or access materials and equipment that is safe to operate. Management shall be responsible for establishing safe operating rules and procedures. Management shall implement an "Out of Service" program for damaged equipment in order to assure prompt and adequate repairs to the equipment. Management shall not allow modification to equipment except those authorized in writing by the equipment manufacturer.

9.2.4 Supervisors

Supervisors shall monitor safe operations of material handling equipment, ensure all equipment is safety checked daily, and tag “Out of Service” any damaged or defective equipment.

9.2.5 Employees/ Operators

Employees/ Operators shall operate only that equipment for which they have been specifically trained and authorized. They shall conduct daily safety inspections before using the equipment and report any damage, defects, or missing safety equipment to their supervisor. Employees/ Operators shall observe all safety rules and procedures as set forth by management.

Hazards	Hazard Controls
Unauthorized use	Control of equipment keys
Falling loads	Proper palletizing of material
Overloading of equipment	Proper training and knowledge of equipment capacity
Impact with equipment, product, or building	Marked travel lanes
Impact with personnel	Equipment warning lights, alarm
Piercing of containers	Travel with forks completely lowered
Loading dock roll off	Seat belts, knowledge of vehicle stability
Chemical contact - battery acid	Personal Protective Equipment
Fires during refueling/ recharging	Mounted fire extinguishers, Authorized fueling & recharge areas

9.2.6 Pre-Qualification

All candidates for PIT operators must meet the following basic requirements prior to starting initial or refresher training:

- Must have no adverse vision problems that cannot be corrected by glasses or contacts
- No adverse hearing loss that cannot be corrected with hearing aids
- No physical impairments that would impair safe operation of the PIT
- No neurological disorders that affect balance or consciousness
- Not taking any medication that affects perception, vision, or physical abilities

- ## Training

- **Training for Powered Industrial Truck (PIT) Operators** shall be conducted by an experienced operator, selected by Management. All operational training shall be conducted under close supervision. All training and evaluation must be completed before an operator is permitted to use a Powered Industrial Truck (forklift, etc.) without continual & close supervision.

- **Training** shall consist of formal instruction which may include but is not limited to lecture, discussion, computer instruction, videos, demonstrations, and operator's performance evaluation. Truck related topics may include but are not limited to

    1. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate
    2. Differences between the truck and the automobile
    3. Truck controls and instrumentation: where they are located, what they do, and how they work
    4. Engine or motor operation
    5. Steering and maneuvering
    6. Visibility (including restrictions due to loading)
    7. Fork and attachment adaptation, operation, and use limitations
    8. Vehicle capacity
    9. Vehicle stability
    10. Any vehicle inspection and maintenance that the operator will be required to perform
    11. Refueling and/or charging and recharging of batteries
    12. 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.

Workplace-related topics may include but are not limited to:

- Surface conditions where the vehicle will be operated
- Composition of loads to be carried and load stability
- Load manipulation, stacking, and unstacking
- Pedestrian traffic in areas 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

9.2.7 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:

1. The operator has been observed to operate the vehicle in an unsafe manner
2. The operator has been involved in an accident or near-miss incident
3. The operator has received an evaluation that reveals that the operator is not operating the truck safely
4. The operator is assigned to drive a different type of truck
5. 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.

9.2.8 Safe Operating Procedures (SOP) & Rules

- Only authorized and trained personnel will operate PITs.
- All PITs 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 reported for immediate repair or have the PIT taken "Out of Service".
- Operators will follow the proper recharging or refueling safety procedures.
- 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.
- PITs will travel no faster than 5 mph or faster than a normal walk.
- Hard hats will be worn by PIT Operators in high lift areas.
- Operator will sound horn and use extreme caution when meeting pedestrians, making turns and cornering.
- Passengers may not ride on any portion of a PIT. Only the operator will ride PITs. "NO PASSENGERS" decals will be affixed on all PITs.
- If PITs are used as a man lift, an appropriate man lift platform (cage with standard rails and toe-boards) will be used.
- Aisle will be maintained free from obstructions, marked and wide enough (six foot minimum) for vehicle operation.
- Lift capacity will be marked on all PITs. Operator will assure load does not exceed rated weight limits.
- When un-attended, PITs will be turned off, forks lowered to the ground and parking brake applied.
- All PITs (with exception of pallet jacks) will be equipped with a multi-purpose dry chemical fire extinguisher. (Minimum rating; 1A:10B:C) Operators are instructed to report all accidents, regardless of fault and severity, to Management. Management will conduct an accident investigation.
- When loading rail cars and trailers, dock plates will be used. Operators will assure dock plates are in good condition and will store on edge when not in use.

- Rail cars and trailers will be parked squarely to the loading area and have wheels chocked in place. Operators will follow established Docking/Un-Docking Procedures.

9.2.9 Changing and Charging Storage 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.
- A conveyor, overhead hoist, or equivalent material handling equipment shall be provided for handling batteries.
- Reinstalled batteries shall be properly positioned and secured in the truck.
- A carboy tilter or siphon shall be provided for handling electrolyte.
- When charging batteries, acid shall be poured into water; water shall not be poured into acid.
- Trucks shall be properly positioned, and brake applied before attempting to change or charge batteries.
- Care shall be taken to assure that vent caps are functioning. The battery (or compartment) cover(s) shall be open to dissipate heat.
- Smoking is prohibited in the charging area.
- Precautions shall be taken to prevent open flames, sparks, or electric arcs in battery charging areas.

Tools and other metallic objects shall be kept away from the top of uncovered batteries

Operations

- If at any time a powered industrial truck is found to be in need of repair, defective, or in any way unsafe, the truck shall be taken out of service until it has been restored to safe operating condition.
- 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.

- Unauthorized personnel shall not be permitted to ride on powered industrial trucks.
- Arms or Legs shall not be placed between the uprights of the mast or outside the running lines of the truck.
- When a powered industrial truck is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, and brakes set. Wheels shall be blocked if the truck is parked on an incline.
- A safe distance shall be maintained from the edge of 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 system, etc.
- An overhead guard shall be used as protection against falling objects. It should be noted that an overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., representative of the job application, but not to withstand the impact of a falling capacity load.
- A load backrest extension shall be used 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.

9.2.10 Traveling

- All traffic regulations shall be observed, including authorized speed limits. A safe distance shall be maintained approximately three truck lengths from the truck ahead, and the truck shall be kept under control at all times.
- The right of way shall be yielded to ambulances, fire trucks, or other vehicles in emergency situations.
- Other trucks traveling in the same direction at intersections, blind spots, or other dangerous locations shall not be passed.
- The driver shall be required to slow down and sound the horn at cross aisles and other locations where vision is obstructed. If the load being carried obstructs forward view, the driver shall be required to travel with the load trailing.
- Railroad tracks shall be crossed diagonally wherever possible. Parking closer than 8 feet from the center of railroad tracks is prohibited.

- The driver shall be required to 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.
- Under all travel conditions the truck shall be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay shall not be permitted.
- The driver shall be required to slow down for wet and slippery floors.
- Dockboard or bridgeplates, shall be properly secured before they are driven over. Dockboard or bridgeplates shall be driven over carefully and slowly and their rated capacity never exceeded.
- Running over loose objects on the roadway surface shall be avoided.

While negotiating turns, speed shall be reduced to a safe level by means of turning the hand steering wheel in a smooth, sweeping motion. Except when maneuvering at a very low speed, the hand steering wheel shall be turned at a moderate, even rate.

9.2.11 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 truck shall be handled.
- The long or high (including multiple-tiered) loads which may affect capacity shall be adjusted.
- 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 high tiering. 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 or tiering, only enough backward tilt to stabilize the load shall be used.

9.2.12 **Fueling Safety**

- Fuel tanks shall not be filled while the engine is running. Spillage shall be avoided.
- Spillage of 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.

9.2.13 Maintenance of Powered Industrial Trucks

- Any power-operated industrial truck not in safe operating condition shall be removed from service. All repairs shall be made by authorized personnel.
- Those repairs to the fuel and ignition systems of industrial trucks which involve fire hazards shall be conducted only in locations designated for such repairs.
- Trucks in need of repairs to the electrical system shall have the battery disconnected prior to such repairs.
- All parts of any such industrial truck requiring replacement shall be replaced only by parts equivalent as to safety with those used in the original design.
- Industrial trucks shall not be altered so that the relative positions of the various parts are different from what they were 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 at least daily. Where industrial trucks 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 of the situation is corrected.

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10.1 Crane Safety

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

10.1.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to cranes or hoists in the workplace. It is not only our goal to prevent lifting incidents, but to eliminate potential lifting hazards.

The most common causes of fatalities, injuries, and/or OSHA citations regarding cranes and hoisting equipment are:

Employees standing under a suspended load.

Lack of proper annual crane inspection.

No Competent Person on site.

Operator and Competent Person unfamiliar with crane capacity.

Working too close to power lines.

10.1.2 Suspended load:

Although Prime employees are not usually subject to working with or around cranes, employees must be aware of and must never be positioned under a suspended load.

10.1.3 Crane inspection:

Employees must never work with a crane that has not been certified within the past 12 months. Compliance with all manufacturer's procedures applicable to operational functions of equipment shall be adhered to. 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 and shall be present in the cab at all times. Consult your supervisor or the Competent Person on site.

In addition, the Competent Person shall conduct all machinery and equipment inspections before each use and during use, to make sure it is in proper operating condition. The Competent Person shall determine that the crane operator is qualified to operate the crane and inspections shall be documented.
Modifications that affect the safe operation or capacity of the equipment must be approved in writing by the crane manufacturer or a registered professional engineer qualified with respect to the equipment involved.

All safety devices 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 restored to proper working order. Examples of safety devices may include crane level indicator, boom stops, jib stops, foot pedal brake locks, horns, windshield glass, operator seat belt, etc.

Refer to the crane manufacturer's instructions to ensure that ground conditions are suitable to support the crane.

Refer to manufacturer's instructions and prohibitions when assembling and/or disassembling equipment. This shall be supervised or conducted by the competent person.

10.1.4 Authority to halt operation/ Signal person:

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

A signal person shall be required when the point of operation is not in full view of the operator or if the view is obstructed in the direction of travel. Site specific safety concerns may also indicate the need for a signal person.

10.1.5 Power lines:

Always assume power lines are energized. Except where power lines are known to be de-energized and grounded, equipment must maintain a safe distance of 10 feet or more for lines carrying 50 kV or less. As the line capacity increases, the safe distance increases.

A pre-task 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.

Some transmission lines may carry as much as 230,000 volts requiring a safe working distance of 16 feet or more.

A proximity alarm may be installed to alert the operator of an electrical hazard.

10.1.6 Struck by accidents:

Employees must maintain a safe distance from equipment such as a crane. A person could become trapped between the crane and a wall, for example, if standing within the swing radius. The crane shall be barricaded to prevent employees from being positioned within the swing radius.

10.2 Material Handling and Storage Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

10.2.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to materials handling, storage. It is not only our goal to prevent these incidents, but to eliminate all potential material handling hazards.

10.2.2 Back injuries:

About 20% of all recordable workplace injuries and illnesses are a result of back injuries.

About 25% of workman's Compensation claims come from back injuries.

About 75% of back injuries occur while lifting.

Back injuries can be prevented by engineering controls such as the use of chainfalls, a hoist, or the use of a forklift or other lift truck. Proper training is required to use any lifting equipment.

Administrative controls do not eliminate the hazard as do engineering controls. However, they do minimize the risk of injury. Strength testing can identify employees who may be likely to be injured and they can be assigned to other duties.

Physical conditioning and stretching before the task can reduce the risk of muscle strain.

Employees should utilize lifting techniques to place minimum stress on the back.

10.2.3 Lifting techniques:

Before lifting, examine the object for sharp corners or edges,, slippery spots, or other hazards.

Know your limits. Ask for help if you need it.

Know where you are going to set the load down and make sure the path is free from obstructions.

Stand close to the load with feet set apart about shoulder width.

Squat down bending at the knees, not the waist.

Get a firm grip on the load. Gloves may help to increase friction and help to grasp the object.

Begin lifting slowly with your legs by straightening them. Never twist your body during this step.

Once the lift is complete, keep the object as close to the body as possible.

10.2.4 Rigging equipment:

Rigging equipment shall be inspected to ensure it is safe. Rigging equipment for material handling shall be inspected prior to use on each shift and as necessary during its use to ensure that it is safe.

All employees shall keep clear of loads about to be lifted and employees are prohibited from working under any suspended load.

Rigging equipment must be inspected prior to the commencement of work on each shift. Damaged slings or attachments must be removed from service immediately and replaced.

Inspections must be made by the Competent Person.

Loads shall not exceed recommended working load limits. An Identification tag shall be permanently affixed to all slings indicating the load ratings.

Rigging equipment, when not in use, shall be removed from the immediate work area.

Tag lines shall be used unless their use creates an unsafe condition.

Hooks on overhaul ball assemblies, lower load blocks, or other attachment assemblies shall be of a type that can be closed and locked, eliminating the hook throat opening. Alternatively, an alloy anchor type shackle with a bolt, nut and retaining pin may be used.

10.2.5 Materials storage:

Storage of building materials within ten feet from the exterior of a structure, must have adequate protection from falling or being blown off by wind.

Storage areas must be kept free from materials that may cause tripping, slipping, fires, explosions, or attract rodents or pests.

The weight of stored materials must not exceed the rated capacity of the floor as specified by the building inspector.

Load limits should be conspicuously posted in all storage areas.

Combustible materials must be stored at least 18 inches away from walls, partitions, or sprinkler heads. Boxed materials must be banded or shrink wrapped. Drums, if stored on their sides, must be blocked to keep them from rolling.

Consider access to stored materials. Materials must not be stored in such a way as to create a hazard when removing the stored material. For example, storing materials too high may create a hazard of falling objects.

11.1 Confined Space Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

11.1.1 Program Objective:

It is our objective to design and implement a confined space program to inform and train each full- or part-time, permanent or temporary employee or sub-contractor on the hazards related to confined space activities in the workplace. It is our goal to provide full information and training to each employee prior to initial assignment, prior to a change in assigned duties, if a new hazard has been created and/or if special deviations have occurred in order to assure the safest possible working conditions. This program shall be reviewed and revised as necessary at least annually or as deemed necessary by the Program Manager or the Assistant Manager(s).

11.1.2 Program Management:

The Jack Moore Associates, Inc. Confined Space Program shall be managed by Peter E. Michaud, who shall be responsible for:

(a) Program implementation which shall provide for the prevention of entry to confined spaces by unauthorized persons.
(b) The identification and evaluation of hazards prior to entry to the permit space.
(c) The provision of barricades and barriers to protect employees from pedestrian, vehicle, or other external hazards.
(d) Employee training for existing and new personnel including temporary and contract personnel if applicable.
(e) Maintenance of complete and up-to-date records and documentation.
(f) Evaluation and selection of a rescue team in the event of emergency.
(g) Manage all questions and concerns regarding the program.
(h) Evaluate the program on a scheduled basis and revise as deemed necessary based on comments and new available data.
(i) File appropriate reports with respective governmental authorities.
(j) Handle all requests for Safety Data Sheets (SDS) and chemical listings on a timely basis.

11.1.3 **Information Accessibility:**

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to Understand"** station and all employees shall be notified of its location.

11.1.4 Confined Space Definitions:

A confined space, in general, is a space which by design has limited openings for entry and egress, unfavorable natural ventilation and is not designed or normally intended for human occupancy. These spaces can include, but are not limited to tanks, pits, vats, barges and manholes.

A permit required confined space is a space where workers may face serious atmospheric hazards. These hazards are described below.

- Asphyxiating atmospheres: including any atmosphere containing less than 19.50% oxygen.
- Toxic atmospheres: any atmosphere that may contain Hydrogen Sulfide (H2S) or other gases, vapors, or fumes known to have poisonous physiological effects.
- Flammable or explosive atmospheres: any atmosphere containing flammable gases, vapors, or dusts at concentrations meeting or exceeding 10% of the lower flammable limit (LFL).
- High levels of combustible dust: atmospheres where combustible dust obscures vision at 5 feet or less.
- Regulated atmospheres: atmospheres where corrosive, toxic, or asphyxiating airborne contaminants exceed or might exceed the current permissible exposure limits (PEL) for the substances. Where there is no PEL, then the limits found in the NIOSH Recommendations for Occupational Health Standards, the threshold limit values (TLV), or other references such as material safety data sheets should be used.
- Mechanical/Electrical hazards: hazards resulting from moving equipment or live electrical circuitry within the confined space, or hazards arising from the lack of space and adequate entrance and exit.

11.1.5 Organization Responsibilities:

Prior to allowing entrance to a confined space the employer or facility owner shall:

- Identify all permit required entry sites.
- Restrict all permit required areas to authorized personnel only.
- Provide for hazard control through engineering or work practices.
- Have entry areas tested and inspected by trained professionals and provide monitoring to ensure hazards remain under control. Entrants or their representatives shall have the opportunity to review test results and shall be entitled to request additional testing at any time.
- Provide training for authorized employees on proper entry procedure, recognition of potential hazards, and proper use of safety and protective equipment and procedures.
- Provide "standby" employees with Self Contained Breathing Apparatus and training on the proper use of SCBA and recognizing hazards.
- Provide a means of continuous communication between the standby person and workers in the confined space.
- Provide a means of emergency rescue by in-house or outside personnel.
- Inform outside personnel in the work area of all potential hazards.

- Maintain documentation and implementation of:
    1. A written procedure for permit entry.
    2. A medical surveillance program, assuring that authorized workers are certified to work in confined spaces, and where necessary, are able to wear the respirators provided.
    3. Rescue procedures.
    4. Means, procedures, and practices for control of identified permit space hazards.

The supervisor or safety professional shall ensure that prescribed procedures for proper work practices and protection are followed by all workers, to include:

- The testing and monitoring of hazards in the confined space. Testing shall include but is not limited to tests to determine Oxygen level, the presence of H2S, flammable gasses, and carbon monoxide.
- Proper use of entry permits.
- Use of lockout/tagout procedures, where necessary.
- Use of an assigned "stand-by" person, trained in rescue procedures and hazards recognition. Under no circumstances shall a single standby person monitor more than one confined space.
- Monitoring is conducted during particularly hazardous operations.
- Only authorized personnel are allowed into confined spaces.
- Prescribed equipment is utilized consistently and correctly.

Authorized employees are responsible for:

- Following all prescribed practices and procedures.
- Reporting any suspected potential or real hazards immediately to the supervisor or safety professional.

11.1.6 General Procedures Permit System:

- All entry into confined spaces will be by permit only. Any employee entering a confined space will complete a permit form specifying the place, time, and purpose of the entry, the personnel assigned for the entry, and the signature and legibly printed name of the person authorizing entry.
- The person authorizing entry or the supervisor in charge of the project will then secure all mechanical equipment and shut off all electrical circuits in the area so that accidental activation cannot occur while employees are in the confined area. A standard lockout/tagout procedure should be used.
- The site supervisor or authorized person will also ensure that the work area is secured to prevent entry by unauthorized personnel or vehicles.
- A designated, trained person will then complete the required safety tests prior to the entry and so indicate on the permit form. Tests performed should cover all potential atmospheric hazards, as more than one can be present at a given time.
- The permit form will then be posted conspicuously on the outside of the work site while work is being conducted.
- On completion of the job, the space shall be closed off and the permit form will be given to the Safety/Industrial Hygiene professional or to the department supervisor, who will close out and keep the permits on file for one year.

11.1.7 Medical Surveillance:

- All employees entering confined spaces will be medically certified as fit to enter and work in such spaces and wear the respiratory and other personal protective equipment necessary to perform such work.
- A form certifying such fitness, signed by a licensed physician, will be kept in the employees personnel file.
- A re-evaluation of each employee's fitness will be made on a schedule determined by the examining physician. All employees wearing respirators for more than thirty days on the job must have physical examinations on an annual basis.

11.1.8 Employee Training:

- All employees required to enter confined spaces will attend a training course that will cover the hazards of confined spaces and and external hazards including, but not limited to pedestrians and vehicles, all aspects of this procedure and full instruction in the use of personal protective equipment that may be needed.
- This training must be updated annually or on a more frequent basis if deemed necessary. Training documentation shall be maintained and on file at Jack Moore Associates, Inc. home office.
- Employees acting as stand-by persons will receive additional training in hazard recognition, emergency response and rescue procedures.
- Entrants are prohibited from performing duties in a confined space when employees of another employer are present in the space. Also, the attendant or supervisor shall not permit employees of another employer to enter the space if our employees are in the space.

11.1.9 Duties of Authorized Entrants:

Entrants shall know the nature of all anticipated hazards of entry including mode, signs and symptoms, and consequences of exposure. They shall be thoroughly trained in the proper use of equipment used in the confined space. Entrants must be in constant communication with the attendant and report when they recognize any warning sign of a dangerous condition, symptom of exposure, or prohibited condition. Entrants are required to exit the space as quickly as possible whenever an order to evacuate is given by the attendant, or if symptoms of exposure or a dangerous condition is recognized.

11.1.10 Emergency Procedures:

If the work inside the confined space creates a potentially hazardous environment as defined in "Permit Required Confined Space", a stand-by observer is required. This person will serve the following functions:

- The stand-by employee will observe the employee inside the space at all times and immediately instruct the employee to leave the space if he has reason to believe that the employee is suffering effects of overexposure to substances present. These signs might include, but are not limited to giddiness or silliness, sleepiness, nausea, headache, disorientation, loud singing or talking, or drunken like behavior.

If the employee inside the area becomes unconscious or distressed in any way, the stand-by employee must call for help before any rescue attempt is made. The stand-by employee shall summon pre-planned rescue services based on the pre-task plan. The pre-task plan is site specific and procedures shall be developed on a site by site basis. Since the size of confined spaces is generally small, with limited entry and exit area, the employee will not enter the space to effect rescue. All employees will be trained to reach into the space, being sure not to put their head into the space and pull the employee out of the confined space. If the configuration of the space requires placing the head inside, the stand-by person must first put on the self-contained breathing apparatus supplied. The stand-by employee shall also prevent unauthorized personnel from attempting rescue.

- Any employee who becomes ill or distressed in any way during an entry will be immediately taken to the nearest hospital for evaluation.
- Rescue services may be provided by the owner of the site or by Jack Moore Associates, Inc. If outside services are required, the stand-by employee shall summon the outside rescue service. Local services contact information shall be determined prior to commencement of entry to the confined space.
- Outside rescue services shall be given the opportunity to inspect the site and conduct practice rescue drills as is deemed necessary.
- Jack Moore Associates, Inc. employees are not usually subject to working in conditions that are immediately dangerous to life and health (IDLH), however if IDLH conditions are present, rescue personnel must be on site during all confined space operations.
- The stand-by employee shall take the following actions when unauthorized persons approach or enter a confined space during operations:
    1. warn the unauthorized persons that they must stay away from the confined space
    2. advise the unauthorized persons that they must exit immediately if they have already entered the confined space
    3. and inform the authorized entrants and the supervisor that unauthorized persons have entered the confined space.

11.1.11 Hydrogen Sulfide (H2S)

H2S is a colorless, transparent gas that is heavier than air and can therefore be found in lower levels of a confined space. It has a characteristic odor of rotten eggs at low concentrations and a sweet odor at higher concentrations. H2S is soluble in water and is flammable. Do not rely on sense of smell to detect H2S because at low levels, H2S can paralyze the respiratory center of the brain and olfactory nerve. Exposure to H2S can cause irritation to eyes, nose, and throat, headache, dizziness, loss of consciousness, and death.

H2S occurs when there is natural decomposition of organic material and can be found in confined spaces such as manholes, trenches, crawlspaces, tanks, and vaults.

H2S is extremely toxic and can cause instant death. It blocks the oxidative process of tissue cells and reduces the oxygen carrying capacity of the blood. It depresses the nervous system and causes respiratory failure and asphyxiation.

Personal, portable, or fixed gas monitors shall be used to detect concentrations of H2S in concentrations of as little as 10 Parts Per Million (PPM) as defined by OSHA 29 CFR 1926.

If known to be present, entrants shall be protected by ventilation, air monitoring, Self Contained Breathing Apparatus (SCBA) or Supplied Air Respirators (SAR). Personal Protective Equipment (PPE) should only be used when engineering controls are not feasible to control exposure to H2S.

Emergency rescue and/or evacuation procedures shall be developed in pre-task planning and shall be site specific. All entrants and attendants shall be informed, trained, and aware of all procedures for rescue and evacuation.

ALL COPIES OF THIS PERMIT ARE TO REMAIN AT THE JOB SITE UNTIL THE JOB IS COMPLETED.

☐ CONFINED SPACE ENTRY PERMIT ☐ HAZARDOUS AREA ENTRY PERMIT

SECTION 1

LOCATION AND DESCRIPTION _____ DATE _____

OF CONFINED SPACE _____ TIME _____

DEPARTMENT _____ EXPIRATION _____

PERSON IN CHARGE OF WORK _____

SECTION 2

SUPERVISOR(S) IN CHARGE OF CREWS TYPE OF CREW PHONE #

_____

_____

_____

SECTION 3

SPECIAL REQUIREMENTS	YES	NO		YES	NO
Lock out - De-energize			Escape Harness		
Lines Broken - Capped or Blanked			Tripod emergency escape unit		
Purge - Flush and vent			Lifelines		
Ventilation			Fire extinguishers		
Secure Area			Lighting		
Breathing Apparatus			Protective clothing		
Resuscitator - Inhalator			Respirator		

SECTION 4

Test(s) to be taken	PEL	Y	N	Date	Date	Date	Date	Date	Date	Date	Date
% of Oxygen	19.5% +21%										
% of LEL	Any % over 10										
Carbon Monoxide	50 ppm										
Aromatic Hydrocarbon	10 ppm										
Hydrocyanic Acid	10 ppm										
Hydrogen Sulfide	10 ppm										
Sulfur Dioxide	5 ppm										
Ammonia	25 ppm										
Other:											
Other:											

GAS TESTER

(Name)_____

Note: Continuous/periodic tests shall be established before beginning job. Any questions pertaining to test requirements contact certified division gas tester, plant gas coordinator or the industrial hygienist.

SECTION 5

Instruments Used (Name)	Type	Ident. No.

Safety Stand-by Person(s) Name/Signature	Employee No.

Authorized by: _____

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11.2 Hand and Power Tool Safety Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

11.2.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to hand and power tool accidents. It is not only our goal to prevent these incidents, but to eliminate all potential hand and power tool hazards.

11.2.2 Requirements:

Each employee shall receive the proper training on all hand and power tools used in their daily operations. Training shall be conducted by the competent person or supervisor. All manufacturer's instructions shall be understood and followed.

11.2.3 Hand tools:

Each employee shall recognize hazards of hand tools and misuse practices. Tools found to be in other than a safe condition, must be repaired or replaced as soon as feasible.

Screwdrivers are not to be used as chisels or modified by grinding the tip to a different shape not intended by the manufacturer.

Loose or splintered handles on hammers, axes, etc., shall not be used and shall be replaced immediately.

Wrenches with misshapen or damaged jaws shall not be used and shall be replaced immediately.

Chisels, wedges, and drift pins with mushroomed heads shall not be used and shall be replaced immediately.

Be aware of dull edges on saw blades, utility knives and scissors. Dull edges make work harder and cause accidents. Always use sharp blades.

Use of non-sparking tools is required in flammable atmospheres.

11.2.4 Power tools:

Each employee shall recognize hazards of power tools and misuse practices.

All electric power tools and extension cords shall be protected by a ground fault circuit interrupter.

Electric power tools with missing ground prongs or other damage shall be removed from service immediately and tagged "DEFECTIVE – DO NOT USE". Double insulated tools do not have a ground prong on the plug and are identified with the symbol ⧈

Tools should never be carried by the cord or hose.

Always keep cords away from heat, oil, and sharp edges. Protect cords and extension cords from vehicular damage.

Disconnect tools when not in use.

Disconnect tools when changing bits and blades.

Power tools equipped with a guard from the manufacturer must have the guard in place whenever the tool is in use.

Always wear proper personal protective equipment when operating power tools.

Keep work area well illuminated.

Operators should not wear loose clothing or jewelry that could get caught in moving parts.

Keep unnecessary bystanders away from the work area.

Always store tools in a dry location.

11.3 Signs, Signals, and Barricade Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

11.3.1 Accident prevention signs and tags:

Signs and symbols shall be visible at all times when work is being performed and shall be removed or covered when the hazard no longer exists.

11.3.2 Danger signs shall be used when an immediate hazard exists. Danger signs shall have red as the predominant color for the upper panel, black outline on the borders, and a white lower panel for additional wording.

11.3.3 Caution signs shall be used to warn against potential hazards or to caution against unsafe practices. Caution signs shall have yellow as the predominant color, black outline on the borders and a yellow lower panel for additional wording.

11.3.4 Exit signs, when required, shall be lettered in red letters not less than 6 inches high, on a white field, and the principle stroke of the letters not less than 3/4 inch wide.

11.3.5 Safety instruction signs shall be white with a green upper panel with white letters to convey the principal message. Any additional wording shall be black letters on the white background.

11.3.6 Accident prevention tags shall be used as a temporary means of warning employees of an existing hazard such as defective tools or equipment. They shall not be used in place of or as a substitute for accident prevention signs.

11.3.7 Signaling:

Signaling by flaggers and the use of flaggers, including warning garments worn by flaggers, shall conform to Part VI of the Manual on Uniform Traffic Control Devices, (1988 edition, or the Millennium edition), which are incorporated by reference in 1926.200(g)(2).

11.3.8 Barricades for protection of employees shall conform to Part VI of the Manual on Uniform Traffic Control Devices (1988 edition, or the Millennium edition), which are incorporated by reference in 1926.200(g)(2).

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11.4 Trenching and Excavation Safety Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

11.4.1 Program Objective:

It is our objective to design and implement a communications program to inform and train each full or part time, permanent or temporary employee or sub-contractor on the hazards related to trenching and excavation accidents. It is not only our goal to prevent these incidents, but to eliminate all potential trenching and excavation hazards.

The most common cause of a trench collapse is due to the lack of inspection by a Competent Person followed by a lack of egress from the trench. Workers must also be protected from falling objects, equipment, or excavation spoils falling into the excavation.

The competent Person must have specific training in soil analysis, the use of protective shoring systems, and the requirements of OSHA Subpart P, 29 CFR 1926.650.

11.4.2 Requirements:

Prior to excavation, underground utilities must be located and the appropriate utility companies notified.

Each employee in an excavation must be protected from cave-ins by an adequate protective system designed in accordance with 1926.652 paragraph b or c except when excavations are made entirely in stable rock or excavations are less than 5 feet deep and the Competent person provides no indication of a potential cave-in. Employees shall be protected from cave-ins caused by vehicles working in proximity to the excavation.

11.4.3 Soil classification:

The Competent Person, trained in soil mechanics, will determine the class of the soil. No soil is to be considered other than “Type C” if criteria for Type A or B is unknown. Type C soil means a cohesive soil with an unconfined compressive strength of 0.50 tons per square foot or less.

11.4.4 Sloping and benching:

If shoring systems or trench boxes are not feasible, employees shall be protected from trench collapse by means of sloping or benching. For example: Type C soil requires a slope of 1.5 to 1 or 15 feet back for each 10 feet of depth. Consult Subpart P, 29 CFR 1926.650 for sloping and benching requirements and diagrams.

11.4.5 Access and Egress:

Structural ramps used by employees as a means of access or egress shall be designed by the Competent Person.

Ramps, stairways, ladders, or other safe means of access or egress shall be located in excavations four(4) feet or more in depth so as to require no more than twenty-five(25) feet of lateral travel for employees.

11.4.6 Fall protection:

Where walkways are constructed crossing the excavation and are 6 feet or more above the lower level, guardrails shall be constructed in compliance with 1926.502(b).

11.4.7 Exposure to falling loads:

No employee shall be allowed to remain in an excavation while loads are being lowered into or lifted from an excavation.

11.4.8 Exposure to vehicular traffic.

When exposed to vehicular traffic, employees are required to don a minimum ANSI Class 2 vest, T-shirt, or jacket for visibility.

11.4.9 Hazardous atmospheres:

Trenches and excavations shall be considered a confined space. The Competent Person shall follow procedures as set forth in the "Confined Space Program" of this manual.

Employees are prohibited from working in excavations where water has accumulated or is accumulating. If control of water accumulation is accomplished by the use of removal equipment (pumps), the competent person shall monitor the equipment to ensure proper operation.

11.4.10 Inspections:

The Competent Person shall conduct daily inspections to assure the safety of employees on a daily basis and before employees enter the excavation.

11.5 Process Safety Management Program

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

11.5.1 Program Objective:

This program addresses requirements for Prime Drilling and Sawing Services and its subcontractors for the purpose of assisting our clients in preventing or minimizing the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals during the course of our work.

11.5.2 Training:

All Prime Drilling and Sawing Services (PD&SS) and its subcontractors covered under this program will be trained and provided all the necessary information concerning the scope of work and the potential hazards involved including potential fire, explosive, or toxic release hazards.

11.5.3 Regulatory Reference:

This program is intended to satisfy the requirements contained in 29 CFR 1910.119.

11.5.4 Responsibilities:

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11.5.4.1 Management responsibilities – relative to performing work on or adjacent to the client's processes, process equipment or hazardous materials covered by the 29 CFR 1910.119 Standard.

- Ensure that PD&SS employees are trained in work practices necessary to perform assigned work safely including Permit to Work procedures.
- Ensure that PD&SS employees are instructed in the hazards related to the processes, process equipment or hazardous materials associated with their assigned work and work locations.
- Ensure that PD&SS employees are instructed in their responsibilities under the Emergency Preparedness and Response Plans.
- Ensure that training and instruction documentation is maintained.
- Ensure that PD&SS employees are trained and follow the safety rules and safe work practices of the facilities in which they are assigned to work. The client's safe work practices must be followed during operations such as Lock-out/Tag-out, confined space entry, opening process equipment or piping, and control over entrance to the facility.
- Inform the client of any unique hazards created the work conducted or hazards discovered by PD&SS employees not previously identified.

11.5.4.2 Supervisors

- Be familiar with and understand the requirements of this Process Safety Management Program.
- Arrange/facilitate training and instruction sessions required to ensure PD&SS employees are trained in work practices necessary to perform assigned work safely including Permit to Work procedures.
- Arrange/facilitate training and instruction sessions required to ensure PD&SS employees are instructed in the hazards related to processes, process equipment or hazardous materials associated with their assigned work and work locations.\
- Arrange/facilitate training and instruction sessions required to ensure PD&SS employees are trained and follow the safety rules and safe work practices of the facilities in which they are assigned to work
- Identify and understand PD&SS and PD&SS employee's duties and responsibilities under the Emergency Preparedness and Response plans.
- Arrange/facilitate training and instruction sessions required to ensure that PD&SS employees are instructed in their responsibilities under the Emergency Preparedness and Response plans.
- Secure and maintain all required documentation under this Process Safety Management Program.
- Lead or participate in incident investigations.
- Inform PD&SS main office if assistance from the safety manager is required during incident investigations.
- Complete and provide the client with all required incident investigation documentation including resolutions or corrective actions.

11.5.4.3 Employees responsibilities - relative to performing work on or adjacent to the client's processes, process equipment or hazardous materials covered by the 29 CFR 1910.119 Standard.

- Participate in and understand training in work practices necessary to perform your assigned work safely including Permit to Work procedures.
- Participate in and understand hazard instructions related to processes, process equipment or hazardous materials associated with your assigned work and work locations.
- Know and understand your responsibilities under the Emergency Preparedness and Response plans. Know, understand and follow the safety rules and safe work practices of the facilities in which you are assigned to work.
- Inform your immediate supervisor of any unique hazards created by your work or hazards discovered that were not previously identified.

11.5.5 General Procedures

- **Client procedures**
  Whenever PD&SS performs contract services for a client with a similar procedure or special requirements, the client's procedure may be applied as a substitute procedure if it meets or exceeds our procedure. Examples of this may be Confined Space Entry or Lock-out/Tag-out to control hazardous energy.

- **Client's Technology**
  PD&SS personnel will not divulge any knowledge gained through the Process Safety Management process pertaining to the client's proprietary processes or trade secrets and will sign statements to that effect is required.
- **Access control**
  The client maintains security around the facility and process area to insure that no unauthorized subcontractors have entrance or presence in or to the process area, and that a safe exit is provided and maintained.
- **Contract Services**
  Pre-work review: Prior to PD&SS commencing work in any client's facility, the following requirements must be met:
    - Provide information regarding PD&SS's safety performance and programs.
    - PD&SS will request information from the client regarding the known potential fire, explosion, or toxic release hazards related to the work and the process.
    - PD&SS will review the client's emergency action plan.
    - PD&SS will review copies of local safety programs, safety and emergency procedures, Safety Data Sheets (SDS) associated with the work and the clients Process Safety Management Program.
    - PD&SS will provide the client with information relating to any unique hazards presented by the work or any hazards found by our employees.

  Prior to the start of any work, PD&SS will provide the following documentation:
    - All safety program information and other documentation required by the client.
    - Certification that PD&SS has informed their employees of potential fire, explosion, or toxic release hazards they may exist at or near their work area and that they have explained the Emergency Action Plan to their employees.
    - Training documentation concerning training provided to PD&SS employees to ensure they understand the safe work practices to safely perform tasks. This documentation will contain, at a minimum, the following information:
      - **Employee's name**
      - **Training date**
      - **Means employed to verify comprehension**
    - Certification that they understand the client's Hot Work Permit Program and other permits the client uses that will be needed during their time on the client's property. Hot work shall not commence until a valid permit is issued by the Permitting Authority and is obtained by PD&SS. As a minimum, Hot Work Permits shall comply with the latest revision of PD&SS's safety program.

- **Prime subcontractors**
  Pre-work review: Prior to allowing a subcontractor to work in any client's facility, the following requirements must be met:
    - Provide information regarding the subcontractor's safety performance and programs.
    - Inform subcontractors regarding the known potential fire, explosion, or toxic release hazards related to the work and the process.
    - Explain to the subcontractors the client's emergency action plan.
    - Provide subcontractors with copies of local safety programs, safety and emergency procedures, Safety Data Sheets (SDS) associated with the work and the clients Process Safety Management Program.
    - Complete all the requirements of PD&SS subcontractor liability agreement
    - Inform the subcontractor that a periodic performance evaluation will be conducted to ensure the subcontractor and employees are fulfilling their obligations.
    - Inform the subcontractor that a subcontract illness and injury log related to the subcontractor's work in the process areas must be maintained on site for the duration of the subcontract work.
    - The subcontractor must provide information relating to any unique hazards presented by the subcontractor's work or any hazards found by the subcontractor employees.

  Prior to the start of any work, the subcontractor will provide the following documentation:
    - All safety program information and other documentation required by the client.
    - Certification that they have informed their employees of potential fire, explosion, or toxic release hazards they may exist at or near their work area and that they have explained the Emergency Action Plan to their employees.
    - Training documentation concerning training provided to their employees to ensure they understand the safe work practices to safely perform tasks. This documentation will contain, at a minimum, the following information:
      - **Employee's name**
      - **Training date**
      - **Means employed to verify comprehension**
    - Certification that they understand the client's Hot Work Permit Program and other permits the client uses that will be needed during their time on the client's property. Hot work shall not commence until a valid permit is issued by the Permitting Authority and is obtained by the subcontractor.
    - Agreement to advise the client of any unique hazards presented by their work, if any, found during their work.
    - Certification the materials, parts, and equipment to be installed in the scope of work meet industry and engineering standards for the application used.

The PD&SS Superintendent is responsible for issuing information and documents to the subcontractor and collection and review of subcontractor information and certifications.

11.5.6 Accident Investigation

PD&SS will immediately report to the client all incidents involving their employees or subcontract personnel. The onsite supervisor will either lead or participate in the incident investigation and will inform the main office if the assistance of the PD&SS safety manager is required. The onsite supervisor will be responsible for completing and providing the client with all the required documentation including all resolutions and corrective actions. As a minimum, PD&SS supervisor shall follow incident investigation and reporting procedures established in the most current revision of the PD&SS safety manual.

The following shall apply:

- All incidents resulting in or that could have reasonably resulted in a catastrophic release of highly hazardous materials shall be investigated.
- An investigation shall be initiated no later than 48 hours following the incident.
- The investigation team shall include at least one person knowledgeable in the process, hazardous materials or equipment involved.
- A report shall be prepared following the investigation that includes the following minimum information"
    - **Date of incident**
    - **Date investigation began**
    - **Description of the incident**
    - **Recommendations resulting from the investigation**

PD&SS shall maintain an injury and illness log related to the onsite work.

11.5.7 Training

All PD&SS employees and subcontractors involved in providing services on, or the installation of equipment at the client's facility shall be trained in the hazards and safe work procedures necessary to perform their assigned work safely.

Training shall include:

- Safe work practices necessary to perform assigned work safely including Permit to Work procedures.
- Hazards related to processes, process equipment, or hazardous materials associated with their assigned work and work locations.
- Responsibilities under the Emergency Preparedness and Response plans.
- Safety rules and safe work practices of the facilities in which they are assigned to work.
- Responsibilities to inform the client of any unique hazards created by the execution of PD&SS work or hazards discovered that have not previously been identified.

11.5.8 Reporting and Recordkeeping

Training – All training shall be documented.

Documentation shall contain, at a minimum, the following information:

- **Employee's name**
- **Training date**
- **Means employed to verify comprehension**

Reports- All exposure incidents and near misses shall be immediately reported.

Incident Report – All exposure events resulting in injury, illness, or loss of consciousness of an employee shall be recorded as incidents on a PD&SS incident report.

Spills – Spills or releases that meet any of the following criteria shall be recorded as incidents on a PD&SS incident report including, but not limited to:

- Oil bases fluids spilled on land or water in excess of five (5) gallons.
- Chemical based fluids or products spilled on land or water in excess of five (5) gallons or five (50) pounds, whichever is less.
- Spills or releases of any product within the client's reporting criteria.

Near Miss Reports – Failures in containment, control methods, isolation, etc., not resulting in employee injury, illness, or exposure, shall be recorded as near miss events on a PD&SS incident report form and noted as a "near miss".

Control and retention – Records associated with this program shall be handled in the following manner:

- **Custodian** - PD&SS safety manager shall be the custodian of all the records associated with this program.
- **Incidents** – shall be handled per the incident reporting and recordkeeping program and shall be maintained for a minimum of five (5) years.
- **Availability** – A copy of this plan shall be made available, upon request, to all employees, and any OSHA Compliance Officer(s).

11.6 Quality Control

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 23, 2021

11.6.1 Program Objective:

It is our objective to design and implement a quality control program to inform and train each full- or part-time, permanent or temporary employee or sub-contractor on the elements related to meeting the requirements of the client. It is our goal to provide full information and training to each employee prior to initial assignment, prior to a change in assigned duties, if a new hazard has been created and/or if special deviations have occurred in order to assure the safest possible working conditions. This program shall be reviewed and revised as necessary at least annually or as deemed necessary by the Program Manager or the Assistant Manager(s).

11.6.2 Program Management:

The Jack Moore Associates, Inc. Designated Quality Manager shall be Bruno Frongillo. He shall be responsible for training and supplying the necessary equipment for employees to successfully meet the demands of the client. Project foremen shall also be responsible for implementing procedures properly and training employees in these procedures.

When procedures or policies are not adhered to, the Designated Quality Manager shall address the issue and retrain the employee as deemed necessary. The Designated Quality Manager and/or project foreman shall periodically inspect and approve the process during the course of the project.

11.6.3 Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to Understand"** station and all employees shall be notified of its location.

11.6.4: Communications:

Prior to the commencement of the project, a project start up meeting will be held to discuss the quality and cleanliness of the project. Issues such as water control, dust control, noise, and debris removal shall be addressed before work begins. All affected employees and project management shall attend the start-up meeting.

If there are unanswered concerns, they shall be addressed before work begins.

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11.7 Pandemic Plan

Peter E. Michaud
Program Manager

Bruno Frongillo, Brian Pastor
Assistant Program Managers

Revised
February 26, 2021

11.7.1 Program Objective:

It is our objective to protect our employees, customers, facilities, and recourses to the best of our ability. We are also committed to ensuring that we can continue all aspects of our business during a pandemic and safely resume normal operations as soon as possible in the event a pandemic affects our facility or jobsites.

11.7.2 Program Management:

The Jack Moore Associates, Inc. Designated Pandemic Plan Manager shall be Bruno Frongillo. He shall be responsible for training and supplying the necessary information and PPE for employees to successfully meet the demands of the client(s). Project foremen shall also be responsible for implementing procedures properly and training employees in these procedures. The plan manager and assistant managers shall review the procedures of the plan and evaluate its effectiveness after any employee infection and return to work.

When procedures or policies are not adhered to, the Designated Quality Manager shall address the issue and retrain the employee as deemed necessary. The Designated Pandemic Plan Manager and/or project foreman shall periodically inspect and approve the process during the course of the project(s).

11.7.3 Information Accessibility:

All employees shall have full access to the information contained in this written plan at any time. This written plan shall be posted near the **"Right to Understand"** station and all employees shall be notified of its location.

11.7.4: Immediate steps:

Any employee who feels sick or exhibits symptoms of any pandemic virus will be required to stay home from work. If tests indicate a positive result, a quarantine period may be imposed according to the advice of the CDC and/or local authorities.

If the normal duties of the employee can be conducted from home, it will be required whenever possible.

Reduction of work hours or staggered schedules may be required in order to limit the amount of personal contact between employees. Should a large percentage of employees become ill, scheduling shall be managed by Mark Wilson, Bruno Frongillo, and Brian Pastor. Workstations shall be at least six (6) feet apart from each other. When social distancing cannot be maintained, proper PPE shall be required such as face masks, face shields, and safety glasses.

Employees are advised not to share office equipment such as, but not limited to telephones, computers, or calculators. Commonly contacted surfaces shall be periodically disinfected.

Personal Protective Equipment should never be shared. Single use PPE, such as disposable respirators or BFE95 procedural face masks, and gloves shall be disposed of properly.

Wash hands often and whenever contact is made with anything questionable. Wash hands after removal of disposable PPE. Hands may be contaminated during the removal process.

Employees are encouraged to avoid large gatherings.

Avoid touching face, mouth, nose, and eyes. A virus can enter the body through the thin membranes located in this region.

Use a hand sanitizer with at least 60% ethyl alcohol, or isopropyl alcohol when hand washing is not possible. Hand sanitizing stations can be found in various locations in the office and in rest rooms.

Use good cough/sneeze etiquette. Cough or sneeze into a disposable tissue or into the inside of your elbow if a tissue is not available. Never cough or sneeze into your hands.

Promote healthy lifestyles. Good nutrition, exercise, and smoking cessation can increase your body's ability to fight off or recover from an infectious disease.

11.7.5. Temperature monitoring

On a daily basis, the program manager or one of the assistant managers will take the temperature of all employees on site. The readings shall be gathered using a non-contact infrared body thermometer and recorded. For privacy purposes, employee's names shall not appear on the daily log, but rather given a case number.

Employees with an elevated temperature will be asked to go home and contact their Primary Care Physician for further instructions. In the event an employee does not have a PCP, they will be required to contact a local clinic.

Employees who are required to be off site will be marked as "out of office" and their temperature shall not be recorded unless they return to the office before the end of the day.

Employees are encouraged to obtain vaccine immunization when it becomes available.

11.7.6. Employees required to work off site:

Employees who are required to be on construction sites shall follow the rules put in place by the client.

In the event that we should experience an outbreak which affects our ability to perform work, Bruno Frongillo and/or Brian Pastor shall be responsible for notifying the primary contact for the client(s) and suppliers for the project. Notification shall be both in writing via email and verbally via telephone to assure the affected parties receive notification.

Upon resuming operations, key contacts for the client(s) and suppliers shall be notified both in writing via email and verbally via telephone as soon as possible before operations begin.

Following a pandemic outbreak within the company, Bruno Frongillo shall be responsible for identifying the reason or reasons for the outbreak. Bruno Frongillo and Brian Pastor shall determine what corrective actions are necessary to prevent future outbreaks.