

Who We Are

Since the early 1980's, NC Sturgeon has been a leading Design-Build firm with a diversified portfolio. From religious, aerospace, nuclear, medical, oil & gas, commercial, industrial, retail and educational facilities to everything in between, we approach each project with laser focus on design, value, and constructability. Every team member takes pride in the challenge of finding a better solution to design, cost, and schedule and we're not satisfied until the owner is satisfied with all aspects. When the design is complete, we will have value-engineered each and every scope of work, and we will have provided accurate cost estimates. We deliver a guaranteed maximum cost to the owner, upfront and guaranteed, without these risks to the owner.

After construction documents are complete, and a thorough preconstruction meeting informs the owner what to expect, we normally shorten construction time with early orders of long lead items and early delivery of in-house permit drawings. When the sitework is complete, we can man the project with self-performing concrete crews that have been QL/QC certified by the Nuclear Regulatory Commission (NRC). After the concrete is poured, we maintain an expedited schedule and ensure the quality with our self-performing steel erectors and/or tilt-wall erectors, all also certified by the NRC. With in-house self-performing crews, we control the schedule, and we are not at the mercy of subcontractors.

There will always be issues and concerns with any building project, but NC Sturgeon has the financial strength and in-house professionals to overcome the obstacles and pave the way for a smooth, fun building project.

“Quality is never a case of money...but of Imagination, Ingenuity, and Integrity”

Letter to Employees

For nearly half a century, NC Sturgeon employees have worked tirelessly to deliver outstanding projects, services and solutions to our customers. This hard work has yielded consistent, long-term success. We continue to gain new customers and to expand relationships with existing customers, and I am proud of our accomplishments.

One of our greatest accomplishments however, is deep within our company in the way we protect ourselves and our fellow employees by working safely in an unsafe industry. As of this date, our experience modifier is .61% which is almost unheard of in our line of work. We didn't achieve that remarkable rate by preaching, demanding, or beating down employees. We achieved this stature by educating each skilled worker on safe work practices and by watching out not only for "me" but for the person working next to "me". Our Safety Lotto reminds every person every week that there is a reason for all of us to be safe and that our company is most concerned with your safety and well-being.

We now have a third generation of workers at NC Sturgeon. Your parents and grandparents would not have encouraged you to work here if they didn't know for a fact we are among the safest construction companies in the nation which should comfort the new hires.

Our safety record is a very powerful statement about NC Sturgeon and helps keep us profitable long term. It also helps us sleep at night and never have to inform a relative that their loved one has been injured.

Remember to always report unsafe workers or work practices and that there will never be retaliation for doing so. We all have to make decisions every day, we ask you to make your decisions based on integrity.

Thank you once again for doing the right thing

Chuck Sturgeon
President
NC Sturgeon, LP

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			Initial Issue Date	03/2016
			Revision Date:	Initial Version
	AERIAL LIFTS		Revision No.	0
Next Revision Date:			TBD	
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Purpose

The purpose of this program is to define the requirements for safely operating an aerial lift device.

Scope

This policy shall cover all aerial lift devices used on company property.

Key Responsibilities

Supervisors

- Shall ensure that all aerial devices are properly operated by trained personnel.
- Shall ensure that aerial lift devices are designed and constructed in conformance with applicable requirements of the American National Standards for "Vehicle Mounted Elevating and Rotating Work Platforms" ANSI A92.2-1969, including appendix.

Employees

- Shall follow all aspects of this program.

Procedure

- Aerial lifts may be "field modified" for uses other than those intended by the manufacturer provided the modification has been certified in writing by the manufacturer or by an equivalent entity.
- Lift controls shall be tested each day prior to use to determine that such controls are in safe working conditions. Tests shall be made at the beginning of each shift during which the equipment is to be used to determine that the brakes and operating systems are in proper working condition.
- Only authorized persons shall operate an aerial lift and boom and basket load limits specified by the manufacturer shall not be exceeded.
- Aerial lifts shall have a working back-up alarm audible above the surrounding noise level or the vehicle is backed up only when an observer (spotter) signals that it is safe to do so.
- The minimum clearance between electrical lines and any part of the equipment (i.e. crane or load) shall be 10 feet for lines rated 50 kV or below.
- Employees shall always stand firmly on the floor of the basket, and shall not sit or climb on the edge of the basket or use planks, ladders, or other devices for a work position.
- An approved fall restraint system shall be worn when working from an aerial lift. The fall restraint system must be attached to the boom or basket. An approved fall restraint system shall be attached to the boom or basket when working from an aerial lift and it is not permitted to be attached to adjacent poles or structures.
- All employees who operate an aerial lift device shall be trained in the safe operation of the specific device they will operate. Training must conform to all OSHA requirements.

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				Initial Issue Date	02/2016
				Revision Date:	Initial Version
	ASSEMBLY/DISASSEMBLY CRANES			Revision No.	0
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Purpose

The purpose of this program is to set forth procedures for the assembly and disassembly (general requirements) of cranes and derricks in construction as required by 29CFR 1926.1404.

Scope

This program applies to all **NC Sturgeon** employees, temporary employees and contractors. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Requirements

Supervision of Assembly/Disassembly

The assembly/disassembly (A/D) of equipment is directed by a person considered both competent and qualified. A/D must be directed by a person who is both competent and qualified or by a competent person who is assisted by one or more qualified persons. This person is considered the A/D director.

OSHA defines a Competent and Qualified person as the following:

- Competent Person – "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."
- Qualified Person – "A person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, successfully demonstrated the ability to solve/resolve problems relating to the subject matter, the work, or the project."

The A/D director must understand and be knowledgeable in the applicable assembly/disassembly procedures prior to the commencement of such activities involving A/D.

Crew Member Knowledge Requirements

Crew members must understand their tasks prior to commencing A/D activities. The A/D director is responsible for ensuring crew members are knowledgeable of their tasks prior to commencing work.

Crew members must understand the hazards associated with their tasks. Prior to starting work, the A/D director is responsible for ensuring crew members are knowledgeable of the hazards associated with their tasks.

Crew members must understand the hazardous positions/locations they need to avoid before commencing work. The A/D director is responsible for ensuring crew members are knowledgeable before commencing work of the hazardous positions/locations they need to avoid.

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Hazard Identification

The A/D director shall be responsible for addressing the specific hazards associated with assembly/disassembly operations. The A/D director shall be responsible for managing specific hazards associated with assembly/disassembly operations. These include the following hazards:

- Site and ground bearing conditions
- Blocking material
- Proper location of blocking
- Verifying assist crane loads
- Boom and jib pick points
- Center of gravity
- Stability upon pin removal
- Snagging
- Struck by counterweights
- Boom hoist brake failure
- Loss of backward stability
- Wind speed and weather

Load Control

Rated capacity limits for loads must not be exceeded for the equipment being assembled/disassembled. Rated capacity limits for loads imposed on the equipment, equipment components (including rigging), lifting lugs and equipment accessories, must not be exceeded for the equipment being assembled/disassembled during all phases of assembly/disassembly.

Outriggers and Stabilizers

When the load to be handled and the operating radius require the use of outriggers or stabilizers, or at any time when outriggers or stabilizers are used, all of the following requirements must be met:

- The outriggers or stabilizers must be either fully extended or, if manufacturer procedures permit, deployed as specified in the load chart.
- The outriggers must be set to remove the equipment weight from the wheels, except for locomotive cranes. This provision does not apply to stabilizers.
- When outrigger floats are used, they must be attached to the outriggers. When stabilizer floats are used, they must be attached to the stabilizers.
- Each outrigger or stabilizer must be visible to the operator or to a signal person during extension and setting.
- Outrigger and stabilizer blocking must be placed only under the outrigger or stabilizer float/pad of the jack or, where the outrigger or stabilizer is designed without a jack, under the outer bearing surface of the extended outrigger or stabilizer beam.
- For locomotive cranes, when using outriggers or stabilizers to handle loads, the manufacturer's procedures must be followed. When lifting loads without using outriggers or stabilizers, the manufacturer's procedures must be met regarding truck wedges or screws.

Rigging

When rigging is used for assembly/disassembly **NC Sturgeon** must ensure that:

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- The rigging work is done by a qualified rigger.
- Synthetic slings are protected from abrasive, sharp or acute edges and configurations that could cause a reduction of the slings rated capacity, such as distortion or localized compression.
- When synthetic slings are used, the synthetic sling manufacturer's instructions, limitations, specifications and recommendations must be followed.

Inspection

A post assembly inspection upon completion. The post assembly inspection shall insure the selection of components, and the configuration of equipment that affect the safe operation of the crane are in accordance with manufacturer instructions, prohibitions, limitations and specifications.

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			COMPRESSED GAS CYLINDERS	
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Purpose:

The purpose of this program is to prevent injury from failing or failure of compressed gas cylinders and to establish requirements for handling, lifting and storing compressed gas cylinders safely.

Scope

This program covers all employees and contractors who handle, transport and/or use compressed gas cylinders.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper handling, storage and use requirements for compressed gas cylinders.
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.

Employees

- Shall follow all requirements regarding the safe handling, storage and use of compressed gas cylinders.

Procedure

General

Cylinders shall not be accepted, stored or used if evidence of denting, bulging, pitting, cuts, neck or valve damage is observed. If damage is observed:

- The cylinder must be taken out of service.
- The cylinder's owner shall be notified to remove the cylinder from the premises.
- If owned, the cylinder shall be de-pressured and inspected as required by this program.

Cylinder Identification

Gas identification shall be stenciled or stamped on the cylinder or a label used. No compressed gas cylinder shall be accepted for use that does not legibly identify its content by name.

Handling

Valve caps must be secured onto each cylinder before moving or storage.

Secure the cylinder in a blanket when being lifted by mechanical means. Slings, ropes or electromagnets are prohibited to be used for lifting compressed gas cylinders.

The preferred means to move compressed gas cylinders is with a cart, carrier or with a helper.

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Compressed gas cylinders must not be allowed to strike each other.

When a cylinder cap cannot be removed by hand the cylinder shall be tagged "Do Not Use" and returned to the designated storage area for return to vendor.

Storing

All cylinders must be secured upright in a safe, dry, well-ventilated area that limits corrosion and deterioration.

- Cylinders must be secured by means that will prevent the cylinder from falling.
- When securing the cylinder, the restraints shall not be attached to electrical conduit or process piping.

Empty and non-empty cylinders shall be stored separately. All stored cylinders shall be capped.

Oxygen cylinders must be stored a minimum of 20 feet from combustible gas cylinders or areas where there may be open flame or arcing. Cylinders may also be stored where the oxygen is separated from combustible gas cylinders by a 5 foot or higher wall with a fire resistance rating of 30 minutes.

Storage areas for full and empty cylinders must be designated and labeled. Cylinders should be stored in definitely assigned places away from elevators, stairs or gangways.

Use

Cylinders must be equipped with the correct regulators. Regulators and cylinder valves should be inspected for grease, oil, dirt and solvents. Only tools provided by the supplier should be used to open and close cylinder valves.

Never force or modify connections.

Only regulators and gauges shall be used within their designated ratings.

The use of a pressure-reducing regulator is required at the cylinder, unless the total system is designed for the maximum cylinder pressure.

Valves must be closed when cylinders are not in use.

Cylinders shall not be used as rollers or supports.

Cylinders shall not be placed where they can come in contact with electrical circuits.

Cylinders must be protected from sparks, slag or flame from welding, burning or cutting operations.

Empty cylinders must be returned to designated storage areas as soon as possible after use.

Inspection of Compressed Gas Cylinders

NC Sturgeon shall determine that compressed gas cylinders under its control are in a safe condition to the extent that this can be determined by visual inspection. Visual and other inspections shall be conducted as prescribed in the Hazardous Materials Regulations of the Department of Transportation (49 CFR parts 171-179 and 14 CFR part

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103). Where those regulations are not applicable, visual and other inspections shall be conducted in accordance with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962. Some elements include, but are not limited to:

- Hoses and connections should be inspected regularly for damage. Hoses should be stored in cool areas and protected from damage.
- These owned cylinders shall be visually inspected prior to charging, before each use and at least annually.
- All inspections and testing must be documented.

High Pressure Cylinders are those cylinders marked for service pressures of 900 psi and greater.

- High pressure cylinders shall be taken out of service and submitted for re-qualification testing when any of the following conditions are identified by visual inspection.
- Cuts, dings, gouges, dents bulges, pitting, neck damage or evidence of exposure to fire.
- The cylinders shall be inspected and retested according to the requirements stated in 49 CFR 180.205 and .209.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Low Pressure Cylinders are those cylinders marked for service pressures of less than 900 psi.

- Low pressure cylinders fall into two categories, those requiring requalification and those that do not require re-qualification.
- Low pressure cylinders that do not require re-qualification shall be taken out of service and condemned when any of the following conditions are identified during inspection:
- The tare weight of the cylinder is less than 90% of the stamped on weight of the cylinder.
- Observed pitting, dents, cuts, bulging, gouges or evidence of exposure to fire.
- Low pressure cylinders subject to re-qualification shall be taken out of service, inspected and retested when visual inspection identifies any of the following conditions; dents, bulges, pitting or neck damage.
- Re-qualification of non-damaged cylinders shall be conducted per the schedule in 49 CFR 180.209.

Leaking Cylinders

Leaking cylinders should be moved promptly to an isolated, well-ventilated area, away from ignition sources. Soapy water should be used to detect leaks. If the leak is at the junction of the cylinder valve and cylinder, do not try to repair it. Contact the supplier and ask for response instructions.

Transportation

Cylinders must be transported in a vertical secured position using a cylinder basket or cart and must not be rolled. Regulators should be removed and cylinders capped before movement. Cylinders should not be dropped or permitted to strike violently and protective caps are not used to lift cylinders.

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Empty Cylinder Marking

Cylinders should be marked as "MT" and dated when empty. Never mix gases in a cylinder and only professionals should refill cylinders. Empty cylinders must be handled as carefully as when filled.

Engineering Controls

Engineering controls such as emergency shutoff switches, gas cabinets and flow restrictors should be used wherever possible to control hazards. Emergency eyewash facilities should be present where corrosive gases or materials are used.

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Purpose

The purpose of this program is to ensure the safety of all employees and contractors working for **NC Sturgeon** and to comply with all regulations and host clients that pertain to confined spaces.

Scope

This program covers all employees and other workers that may be involved in confined space entry. When work is performed on a non-owned or operated site, the operator's program shall take precedence. This document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Acceptable entry conditions - the conditions that must exist in a confined space to allow entry and to ensure that employees involved with a confined space entry can safely enter into and work within the space.

Attendant - an individual stationed outside one or more Confined spaces who monitors the authorized Entrants and who performs all Attendant's duties assigned in the **NC Sturgeon** Confined Spaces Program. Attendants must have sufficiently completed and fully understands the Confined Space training and is approved by the HSE Manager to work in a confined space as an Attendant.

Authorized Entrant - an individual who is authorized by **NC Sturgeon** to enter a confined space. Entrants must have sufficiently completed and fully understands the Confined Space training and is approved by the HSE Manager to work in a confined space as an Authorized Entrant.

Blanking or Blinding - the absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.

Confined Space

- A space that is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous occupancy.

Double block and bleed - the closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.

Emergency - any occurrence (including any failure of hazard control or monitoring equipment) or an event internal or external to the confined space that could endanger Entrants.

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Engulfment - the surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.

Entry - the action by which a person passes through an opening into a confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the Entrant's body breaks the plane of an opening into the space.

Entry permit – means the written or printed document that is provided by **NC Sturgeon** to allow and control entry into a confined space that contains the information specified in this program.

Entry Supervisor - the person responsible for determining if acceptable entry conditions are present at a confined space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry as required by this section.

- Entry Supervisors must have sufficiently completed and fully understands the Confined Space training and is approved by the HSE Manager to work in a confined space.
- An Entry Supervisor also may serve as an Attendant or as an authorized Entrant, as long as that person is trained and equipped as required by this section for each role he or she fills. Also, the duties of Entry Supervisor may be passed from one individual to another during the course of an entry operation.
- The Entry Supervisor is responsible to test and monitor the atmosphere conditions.

Hazardous atmosphere - an atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a confined space), injury, or acute illness from one or more of the following causes:

- Flammable gas, vapor, or mist in excess of 10 percent of its lower flammable limit (LFL), (0% is normal).
- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent, (20.9 % is normal).
- Any other atmospheric condition that is immediately dangerous to life or health. (Ex.-H2S 10%, 0% is normal).
- Note: For air contaminants for which OSHA has not determined a dose or permissible exposure limit, other sources of information, such as Material Safety Data Sheets that comply with the Hazard Communication Standard, published information, and internal documents can provide guidance in establishing acceptable atmospheric conditions.

Hot work permit - the written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.

Immediately dangerous to life or health (IDLH) - any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a confined space.

- Note: Some materials -- hydrogen fluoride gas and cadmium vapor, for example -- may produce immediate transient effects that, even if severe, may pass without medical attention, but are followed by sudden, possibly fatal collapse 12-72 hours after exposure. The victim "feels normal" from recovery from

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transient effects until collapse. Such materials in hazardous quantities are considered to be “immediately dangerous to life or health”.

Inerting - the displacement of the atmosphere in a permit space by a non-combustible gas (such as nitrogen) to such an extent that the resulting atmosphere is non-combustible. This procedure produces an IDLH oxygen deficient atmosphere.

Isolation - the process by which a confined space is removed from service and completely protected against the release of energy and material into the space by such means as: blanking or blinding; misaligning or removing sections of lines, pipes, or ducts; a double block and bleed system; lockout or tagout of all sources of energy; or blocking or disconnecting all mechanical linkages.

Line Breaking - the intentional opening of a pipe, line, or duct that is or has been carrying flammable, corrosive, or toxic material, an inert gas, or any fluid at a volume, pressure, or temperature capable of causing injury.

Non-Permit Confined Space - A confined space that does not contain or, with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

Oxygen deficient atmosphere - an atmosphere containing less than 19.5 percent oxygen by volume.

Oxygen enriched atmosphere - an atmosphere containing more than 23.5 percent oxygen by volume.

Permit-Required Confined Space - a confined space that has one or more of the following characteristics:

- Contains or has a potential to contain a hazardous atmosphere.
- Contains a material that has the potential for engulfing an Entrant.
- Has an internal configuration such that an Entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section.
- Contains any other recognized serious safety or health hazard.

Permit system - the employer's written procedure for preparing and issuing permits for entry and for returning the confined space to service following termination of entry.

Prohibited condition - any condition in a confined space that is not allowed by the permit during the period when entry is authorized.

Rescue service - the personnel designated to rescue employees from Permit-Required Confined Spaces.

Retrieval system - the equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from confined spaces.

Testing - the process by which the hazards that may confront Entrants of a confined space are identified and evaluated. Testing includes specifying the tests that are to be performed in the permit space.

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Responsibilities

Managers/Supervisor

- Shall ensure that all employees have been trained and fully understand the requirements of this program.
- Shall provide the necessary equipment to comply with these requirements and ensure that all employees are trained on its use.
- Shall ensure that all confined space assessments have been conducted and documented.
- Shall ensure that provisions and procedures are in place for the protection of employees from external hazards including but not limited to pedestrians, vehicles and other barriers and by use of the pre-entry checklist verifying that conditions in the permit space are acceptable for entry during its duration.
- Shall ensure that all Permit-Required Confined Spaces permits are posted.
- Shall ensure an annual review of the program including all entry permits issued that during that annual period.
- Shall ensure that confined spaces are identified properly as either a Non-Permit Confined Space or a Permit-Required Confined Space.
- Shall ensure that all confined spaces that have been identified as “no entry” have signs that state, “DANGER- DO NOT ENTER”.
- Shall ensure signs have been posted at all Permit-Required Confined Space areas that state, “DANGER – PERMIT ENTRY CONFINED SPACE” along with the proper warning word such as “ASPHYXIAN, FLAMMABILITY or TOXIC HAZARD”
- Shall file all permits at the area offices for review. Permits shall be kept on file for one year.

Affected Employee

- Shall attend Confined Space Entry training commensurate with their duties and when duties change as required.
- Shall comply with all aspects of this program.
- Authorized Entrants, Attendants and Entry Supervisors may be any **NC Sturgeon** employee that is authorized by management to work in a confined space setting and that has been trained and is proficient in the understanding of program requirements.

Authorized Entry Supervisor Duties

- Shall have a tailgate safety meeting, with all workers to be involved in the confined space entry and review the job to be performed and what safety concerns may be present.
- Shall confirm that all isolation, Lock/out and Tag/outs have been completed prior to entry into a confined space.
- Shall ensure that the requirements of this program are followed and maintained.
- Shall test all atmosphere conditions prior to entry and shall complete and maintain the confined space permit form, and have it accessible for review on the job site at all times.
- Shall notify **NC Sturgeon** supervisor of entry into a confined space, and notify the supervisor of any changes that may occur, during an entry.
- If the confined space poses a hazard that cannot be eliminated, the Entry Supervisor must arrange for a rescue services.

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- If the confined space poses no hazards to the Entrants, the Entry Supervisor can reclassify the confined space to a Non-Permit Confined Space.
- A stand-by rescue team is not required to be on site for Non-Permit Confined Space entries.

Authorized Attendant Duties

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure.
- Is aware of possible behavioral effects of hazard exposure in authorized Entrants.
- Continuously maintains communication and an accurate count of authorized Entrants in the confined space and ensures that the means used to identify authorized Entrants, and accurately identifies who is in the confined space.
- Remains outside the confined space during entry operations until relieved by another Attendant.
- If more than one confined space is to be monitored by a single attendant, the program must include the means & procedures that will be used in order to enable the attendant to respond to emergencies in one or more permit spaces that he/she is monitoring without distraction from all responsibilities.
- Attendants may enter a confined space to attempt a rescue, if they have been trained and equipped for rescue operations as required and only when they have been relieved by another authorized Attendant.
- Monitors activities inside and outside the confined space to determine if it is safe for Entrants to remain in the space and orders the authorized Entrants to evacuate the confined space immediately under any of the following conditions:
 - If the Attendant detects a prohibited condition;
 - If the Attendant detects the behavioral effects of hazard exposure in an authorized Entrant;
 - If the Attendant detects a situation outside the space that could endanger the authorized Entrants;
 - If the Attendant cannot effectively and safely perform all the duties required.
- Summon rescue and other emergency services as soon as the Attendant determines that authorized Entrants may need assistance to escape from confined space hazards.
- Takes the following actions when unauthorized persons approach or enter a confined space while entry is underway:
 - Warn the unauthorized persons that they must stay away from the confined space;
 - Advise the unauthorized persons to exit the confined space immediately, if they have entered the space;
 - Inform the authorized Entrants and the Entry Supervisor if unauthorized persons have entered the confined space.
- Performs no duties that might interfere with the Attendant's primary duty to monitor and protect the authorized Entrants.
- Authorized Attendants shall not monitor more than one confined space at a time.

Authorized Entrant Duties

- Knows the hazards that may be faced during entry, including information on the mode, signs or symptoms, and consequences of the exposure;
- Uses appropriate personal protective equipment properly, e.g., face and eye protection, and other forms of barrier protection such as gloves aprons, coveralls, and breathing equipment;

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- Is aware of possible behavioral effects of hazard exposure in authorized Entrants;
- Shall witness and verify calibrated air monitoring data and if approved, sign off, before entry is made.
- Is entitled to request additional monitoring at any time.
- Maintain communication with the Attendants to enable the Attendant to monitor the Entrants status as well as to alert the Entrant to evacuate if needed; and
- Exit from confined spaces as soon as possible when ordered by an Attendant or Entry Supervisor, when the Entrant recognizes the warning signs or symptoms of an exposure exists, or when a prohibited condition exists, or when an alarm is activated.

Procedure

Non-Permit Confined Space Entry

If testing of the confined space atmosphere is within acceptable limits without the use of forced air ventilation and the space is properly isolated, the space can be entered by following the requirements for Level I confined space entry.

- Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
- Entrants shall review and sign the confined space permit.

Employees may enter and work in the confined space as long as LEL, O2, and toxicity hazards remain at safe levels.

- Complete the **NC Sturgeon** Confined Space Entry Permit to document that there are no confined space hazards. Make this certification available to all personnel entering the space.
- A trained Attendant must always be outside the confined space. The Attendant must monitor the authorized Entrants for the duration of the entry operation.

Exception: The Attendant requirements for Level I confined space entry may be exempted, if the job assessment is performed and has determined that there are no inherent dangers to allow single person entry.

- This provision is intended to permit field operations to enter cranks, shallow valve boxes, cellars, excavations, etc. without an Attendant being present and all other aspects of the entry permit complied with.
- When there are changes in the use and configuration of a confined space that might increase the hazards to the Entrants (e.g., using epoxy coating on a tank floor, welding, painting, etc.), re-evaluate the space. If necessary, reclassify the space as a Permit-Required Confined Space.
- Continuously monitor the confined space atmosphere to ensure that it is still safe.
- The space must not contain a hazardous atmosphere while personnel are inside.
- If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
- Re-evaluate the space to determine how the hazardous atmosphere developed.
- The Entry Supervisor shall cancel the entry permit.
- Take action to protect personnel before any subsequent activity to re-enter the space takes place.
- Reissue the **NC Sturgeon** Confined Space Entry Permit before allowing Entrants to re-enter the space.
- If necessary, reclassify the space as a Permit-Required Confined Space.
- Ensure that vehicle or other equipment exhaust does not enter the space.

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Permit-Required Confined Space Entry

If the space is properly isolated and results of air monitoring are above acceptable parameters without local exhaust ventilation in operation, classify the entry as a Permit-Required Confined Space.

- Complete the **NC Sturgeon** Confined Space Entry Permit before proceeding with work in a Permit-Required Confined Space.
- Entrants and/or their representative shall be given the opportunity to observe and participate in the air monitoring process.
- Entrants shall review and sign the confined space permit.
- At least one trained Attendant must always be outside the Permit-Required Confined Space.
- The Attendant must monitor the authorized Entrants for the duration of the entry operation.
- Only authorized Entrants may enter a Permit-Required Confined Space.
- All Entrants must sign in and out on the entry permit when entering and leaving a Permit-Required Confined Space.
- The back of the permit or a sign-in sheet must be used for this purpose.
- Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited.
- Conditions must be continuously monitored where Entrants are working to determine that acceptable conditions are maintained during entry.
- If a hazardous atmosphere is detected during an entry, personnel must immediately evacuate the space.
 - The Entry Supervisor shall cancel the entry permit.
 - Re-evaluate the space to determine how the hazardous atmosphere developed.
 - Take action to protect personnel before any subsequent activity to re-enter the space takes place.
 - Re-issue the **NC Sturgeon** Confined Space Entry Permit before allowing Entrants to re-enter the space.
 - Employees or their representatives are entitled to request additional monitoring at any time.
- The permit must be terminated when the entry operations are complete or when permit conditions change (i.e., hazardous air monitoring results are noted, unsafe behaviors are observed, etc.).
- The minimum rescue equipment required for Permit-Required Confined Space entry is covered in the Rescue & Emergency section of this program.
- Permit-Required Confined Space entry operations will be reviewed when **NC Sturgeon** believes that the requirements of this confined space program may not adequately protect personnel.
- If deficiencies are found in the program, the program will be revised and personnel will be trained in the new revisions before subsequent entries are authorized.

Pre-Job Planning and Space Preparation

The Entry Supervisor must determine that the confined space is properly isolated by blinding, disconnecting, and/or by following local Lockout/Tagout procedures.

The Entry Supervisor must discuss with all Entrants the hazards of the space, communication methods and emergency procedures during the confined space entry.

Eliminate any condition making it unsafe to open the equipment to atmosphere.

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Promptly guard the opening to prevent an accidental fall through the opening and to protect each employee working in the space from foreign objects entering the space.

If applicable, wash, steam, ventilate or degas the confined space to properly free it of possible contaminants. Vent vapors to a safe location.

Do not allow unauthorized personnel to enter a confined space. Barricade and/or guard all confined spaces to prevent entry of unauthorized Entrants.

If performing hot work in the confined space, precautions must be taken consistent with the COMPANY Hot Work Permit procedure.

Ensure that vehicle or other equipment exhaust does not enter the space.

Pre-Entry Safety Meeting

The Entry Supervisor must declare when the confined space is ready for entry.

The Entry Supervisor shall hold a pre-entry safety meeting to discuss all requirements and procedures with all authorized Entrant(s) and Attendant(s) involved with the entry. He/she will discuss other concerns such as previous contents, vessel coating, PPE required etc., during this meeting.

The Entry Supervisor must coordinate entry operations when employees of more than one company are working simultaneously in the confined space. This coordination is necessary so that one company's work does not endanger the employees of another company.

Equipment

Check all work equipment to ensure that it has the proper safety features and is approved for the locations where it will be used. The Entry Supervisor shall ensure that all equipment is properly maintained in a safe condition and that Entrants use the equipment properly.

The following equipment must be considered and may be required when entering a confined space:

- Atmospheric Testing and Monitoring Equipment.
- Barriers, Shields, and Signs – Post signs and barricades outside all Permit-Required Confined Spaces to notify personnel that a confined space entry is in progress and unauthorized entry is prohibited. Any signs used must state "Danger – Permit Entry Confined Space" along with the proper warning word such as "Asphyxiant, Flammability or Toxic Hazard". All barricades must be capable of preventing a person from inadvertently walking into or kicking an object into the space.
- Communications Equipment – Only use intrinsically safe equipment in areas where a hazardous atmosphere may exist. Use a communication system that will keep the Attendant in constant, direct communication with the Entrant(s) working in the confined space. Also, use a communication system that allows the Attendant to summon help from rescue or emergency service.
- Entry and Exit Equipment – (For example: ladders may be needed for safe entry and exit).

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- Lighting Equipment – Needed for safe entry, work within the space and exit. Lighting equipment used in the confined space must be certified safe for the location.
- Portable electric lighting used in wet and/or other conductive locations (drums, tanks, vessels) must be operated at 12 volts or less. 120 volt lights may be used if protected by a ground-fault circuit interrupter.
- Personal Protective Equipment – Ensure that personnel wear the required personal protective equipment. For respiratory protection requirements, refer to the Respiratory Protection Program.
- Rescue and Emergency Equipment – Except if provided by outside rescue services.
- The Attendants must also have an approved first aid kit.
- Vacuum Trucks – When used, trucks must be properly grounded or bonded to prevent static sparks.
- Ventilating Equipment – Local exhaust air movers used to obtain acceptable atmospheric entry conditions (e.g., Copus air movers).
- Other – Any other equipment necessary for safe entry into and rescue from permit required confined spaces.

Air Monitoring

- Before an employee enters the space, the internal atmosphere shall be tested, with a calibrated direct-reading instrument, for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants, in that order. Monitoring of the space must inform the entrants of the potential hazards and results and they must participate in the permit review and signing.
- Air shall be periodically test while continuous ventilation is applied.
- Any employee, who enters the space, or that employee's authorized representative, shall be provided an opportunity to observe the pre-entry testing required by this paragraph.
- Employees or their representatives are entitled to request additional air monitoring at any time.

Ventilation

Continuous forced air ventilation must be used and tested as follows:

- An employee may not enter the space until the forced air ventilation has eliminated any hazardous atmosphere;
- The forced air ventilation shall be so directed as to ventilate the immediate areas where an employee is or will be present within the space and shall continue until all employees have left the space;
- The air supply for the forced air ventilation shall be from a clean source and may not increase the hazards in the space.
- The atmosphere within the space shall be periodically tested as necessary to ensure that the continuous forced air ventilation is preventing the accumulation of a hazardous atmosphere. Any employee, who enters the space, or that employee's authorized representative, shall be provided with an opportunity to observe the periodic testing and may request additional monitoring at any time.
- If a hazardous atmosphere is detected during entry each employee shall leave the space immediately and the space shall be evaluated to determine how the hazardous atmosphere developed; and measures shall be implemented to protect employees from the hazardous atmosphere before any subsequent entry takes place.

Multiple Employer Procedure

In order not to endanger the employees of any other employer, the Entry Supervisor shall:

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- Verify that all contractor employees have been trained in confined space and that all contractor employees fully understand the **NC Sturgeon** procedures pertaining to Confined Space.
- Inform the contractor that the workplace contains permit spaces and that permit space entry is allowed only through compliance with a permit space program meeting the requirements of this section.
- Apprise the contractor of the elements, including the hazards identified and the employees experience with the space, that make the space in question a permit space.
- Inform the contractor of any precautions or procedures that **NC Sturgeon** has implemented for the protection of employees in or near permit spaces where contractor personnel will be working.
- Coordinate entry operations with the contractor, when both **NC Sturgeon** personnel and contractor personnel will be working in or near confined spaces.
- Debrief the contractor at the conclusion of the entry operations regarding the permit space program followed and regarding any hazards confronted or created in confined spaces during entry operations.
- In addition to complying with the confined space requirements that apply to all employees; each contractor, who is retained to perform permit space entry operations, shall:
 - Obtain any available information regarding confined space hazards and entry operations from the **NC Sturgeon** Entry Supervisor.
 - Coordinate entry operations with the **NC Sturgeon** Entry Supervisor, when both **NC Sturgeon** personnel and contractor personnel will be working in or near permit spaces.
 - Inform **NC Sturgeon** of the confined space program that the contractor will follow and of any hazards confronted or created in the confined space, either through a debriefing or during the entry operation.

Rescue and Emergency Services

General

Rescue service must be on-site for immediately dangerous to life and health (IDLH) conditions while work is being performed. Rescue services must be either:

- Provided by the host facility,
- Provided by an outside service which is given an opportunity to examine the entry site, practice rescue and decline as appropriate, or
- Provided by **NC Sturgeon** by selecting a rescue team that is equipped and trained to perform the needed rescue services.
- The Attendant shall order the other Entrants not to move the injured nor allow untrained or unauthorized workers into the space that are not trained to handle a confined space rescue.
- Material Safety Data Sheet's for substances that an injured Entrant was exposed to must be provided to the medical facility treating the injured worker.

Permit-Required Confined Space Rescue:

- When the Attendant becomes aware of the need for rescue, the Attendant shall immediately summon the onsite rescue team by the agreed upon communication method, verbally, radio or cell phone, without leaving the vicinity of the confined space.
- The Attendant shall prevent unauthorized personnel from attempting a rescue.

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- After the rescue team has been notified, the Attendant shall alert the Entry Supervisor of the emergency via the same communication methods.
- The preferred means of providing rescue service is through the use of a qualified outside rescue service vendor (client host). The outside rescue service vendor must be:
 - Informed of the hazards that they may confront during a rescue;
 - Provided access to the Permit-Required Confined Space to examine the entry site, practice rescue, and decline as appropriate.
 - Access to the space allows the rescue service and local supervision to jointly develop appropriate rescue plans.
 - If the host operator is designated to provide rescue services for **NC Sturgeon**, the agreement of services must be included in contract for the job.
- If **NC Sturgeon** employees are to perform Permit-Required Confined Space rescues, they must be:
 - Provided and trained in the use of the proper personal protective equipment necessary to make the rescue;
 - Provided PPE at no cost
 - Trained to perform the assigned duties;
 - Required to practice making rescues at least once every 12 months;
 - Trained in basic first aid and CPR.
 - A minimum of one member of the rescue team must hold a current certification in first aid and CPR.

Non-entry Rescue

- To facilitate non-entry rescue, an Entrant must be attached to a retrieval system whenever he/she enters a Permit-Required Confined Space with a vertical depth of more than 5 feet.
- The retrieval equipment is not required if it will increase the overall risk of the entry, e.g., creating an entanglement hazard, or will not contribute to the rescue of the Entrant.
- Each Entrant shall use a full body harness equipped with a "D" ring located between the shoulders or above the head.
- Wristlets may be used instead of the full body harness, if the use of the full body harness is not feasible or creates a greater hazard *and* that using wristlets is the safest and most effective alternative.
- The retrieval line must be attached to the "D" ring and the other end of the retrieval line attached to a retrieval device or fixed point located outside the space so that rescue can begin as soon as the rescuer becomes aware that rescue is necessary.

Issuance/Reviewing of Permit

Only when all pre-entry requirements are satisfied, the Entry Supervisor shall issue a completed and signed confined space permit. The confined space permit is valid for one shift.

In the event of any unauthorized entry, employee complaints, a hazard not covered by the permit, the occurrence of an injury or near miss the entry permit shall be cancelled and a review shall be conducted to provide employee protection and for revising the program prior to authorizing subsequent entries.

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An annual review of this program, using the cancelled permits retained within 1 year after each entry shall be conducted by the HSE Manager to revise the program as necessary, to ensure that employees are protected. If no confined space entries were performed during a 12 month period, no review is necessary.

Termination and Closing or Cancelling of Permits

The Entry Supervisor shall terminate the confined space permit, at the end of the job operation, at the end of the shift or when the Entry Supervisor or Attendant determine that conditions in or near the confined space have changed and is hazardous to the Entrants.

The Entry Supervisor shall, at the conclusion of entry operation, close out the permit and provide the safety department the original copy of the Confined Space Permit.

Training

Training shall be provided so that all employees whose work is regulated by this program acquire the understanding, knowledge, and skills necessary for the safe performance of the duties assigned to them.

Training shall be provided to each affected employee, before the employee is first assigned duties under this program, if a new hazard has been created or special deviations have occurred and before there is a change in assigned duties.

The employee shall be retrained:

- Whenever there is a change in confined space operations that presents a hazard about which an employee has not previously been trained.
- Whenever the supervisor has reason to believe either that there are deviations from the permit space entry procedures required by this section or that there are inadequacies in the employee's knowledge or use of these procedures.

The training shall establish employee proficiency in the duties required by this program and shall introduce new or revised procedures, as necessary.

The supervisor shall certify that the training required by this program has been accomplished.

- The certification shall contain each employee's name, the signatures or initials of the trainers, and the dates of training.
- The certification shall be available for inspection by employees, their authorized representatives, management, clients and the safety department.

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Purpose

Each **NC Sturgeon** location shall have a written Emergency Action Plan, appropriate to the hazards of the workplace, in order to respond to an emergency that may require rescue or evacuation.

Each Emergency Action Plan shall be prepared to reflect all known probable emergency conditions which may arise from within the workplace and from adjacent workplaces, the minimum of which will include fire or other emergencies.

The emergency action plan must be available to all employees to review. An emergency action plan must be in writing, kept in the workplace and available to employees for review. However, if a site has 10 or fewer employees the plan may be orally to employees.

Emergency Response Planning, Issuing and Annual Review Guidelines

Emergency Procedures shall be issued and discussed with all new/transferred personnel upon arrival for assignment.

Emergency Action Plans shall be established, implemented, reviewed, maintained and updated annually in conjunction with:

- Client emergency services department requirements.
- **NC Sturgeon** safety staff and management.
- The requirement to ensure the plan is up to date to reflect current circumstances at the workplace.

The plan is to be reviewed before the job and when conditions warrant and should be used for routine and non-routine emergencies as well as changes in operation, and products or services which warrant new emergencies situations.

Reviewing the Emergency Action Plan with Employees

A review of the emergency action plan should occur with employees:

- When the plan is developed or the employee is assigned initially to a job.
- When the employee's responsibilities under the plan change.
- When the plan is changed.

Procedures for Emergency Evacuation Planning

The emergency action plan must include procedures for emergency evacuation. An emergency action plan must include at a minimum procedures for emergency evacuation, including type of evacuation and exit route assignments.

The individual site evacuation procedure shall be appropriate to the risk must be developed and implemented to:

- Notify staff, including the first aid attendant, of the nature and location of the emergency,
- Evacuate employees safely and procedures to account for all employees after evacuation,
- Check and confirm the safe evacuation of all employees,

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- Notify the fire department or other emergency responders, and
- Notify adjacent workplaces or residences which may be affected if the risk of exposure to a substance extends beyond the workplace. Notification of the public must be in conformity with the requirements of other jurisdictions, including provincial and municipal agencies.

List of Potential Emergencies

The emergency action plan must include procedures for reporting a fire or other emergency. An emergency action plan must include at a minimum procedures for reporting a fire or other emergency.

Each location shall conduct a risk assessment for hazards posed by potential hazardous substances from accidental release, fire or other such emergencies that could cause an evacuation or rescue and list the potential emergencies for **NC Sturgeon** operations. Procedures for each of these potential emergencies shall be contained within the Emergency Action Plan. Examples include:

- Fire
- Gas Leaks/Chemical Spills
- Bomb Threats
- Medical Emergencies
- Explosion
- Workplace Violence

Guidance Procedures for Potential Emergencies

Fire

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if present.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Gas Leaks/Chemical Spills - Upon smelling or noticing a gas leak or unusual vapors, or a chemical spill:

- Pull fire alarm (if present) or sound warning and evacuate the premises via the nearest exit
- Proceed to the Emergency Assembly Area
- Contact local emergency response personnel by phone or radio
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

If employees are required to control a release of a hazardous substance, to perform cleanup of a spill, or to carry out testing before re-entry, COMPANY shall provide:

- Adequate written safe work procedures and documented training.
- Appropriate personal protective equipment which is readily available to employees and is adequately maintained, and
- Material or equipment necessary for the control and disposal of the hazardous substance.

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Bomb Threats

- If a threat is received by phone, mail or other means, get as much information as possible.
- If the threat is received by phone, try to keep the person on the line for as long as possible. Do not hang up the phone, even after the call has been terminated.
- Contact local emergency response personnel by phone or radio.
- If a suspicious device is identified, evacuate the immediate area and notify local emergency response personnel.

Medical Emergencies

- Call for assistance by phone or radio. Give the exact location and details of the medical emergency.
- If qualified, provide basic first aid, and keep the person comfortable. Do not move the person. Do not leave him/her unattended.
- Arrange for emergency medical transportation based on the medical planning portion of the site's Emergency Action Plan.

Explosions

- Get down on the floor, take shelter under tables or desks, and protect your face and head against flying glass and debris.
- Once it is safe to do so, evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Workplace Violence

- Notify security immediately by phone or radio and report the occurrence.
- Do NOT attempt to physically intervene. Protect yourself first at all costs.

Emergency Response Equipment

Listing of Types of Emergency Equipment

Each site Emergency Action Plan shall identify, list the locations of and provide operational procedures for types of emergency equipment. For off-site locations, available emergency equipment should be identified and reviewed with workers prior to commencing work activities. Examples include:

- Living areas with an audible alarm and a fire hose cabinet.
- Emergency lighting, exit doors, dampers and fire stop flaps.
- First aid kits located throughout the facility and in vehicles.
- Portable fire extinguishers being located throughout the facility and clearly marked.
- Only authorized and trained personnel will operate emergency equipment.

Inspection & Maintenance Records

Maintenance records must be kept, including but not limited to the name of manufacturer, the type of equipment, the date put into service, when and for what purpose the equipment has been used, the date of the last inspection and name of the inspecting person, any damage suffered, and the date and nature of any of maintenance on

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emergency response equipment.

Ropes and associated equipment must be inspected visually and physically by qualified employees after each use for rescue, evacuation or training purposes.

The **NC Sturgeon** designated representative will perform and maintain the **NC Sturgeon** Emergency Inspection Checklist Form on a monthly basis. The checklist shall be maintained for retention in active files for two years and in on site archives for seven years.

Media Response Plan

NC Sturgeon employees must not be interviewed by anyone unless the Legal Department has given prior approval. In most cases the Legal Department will have an attorney present for such interviews.

Note: If after **NC Sturgeon** personnel have received approval for an interview from the Legal Department and another party's attorney appears unannounced, you should politely adjourn the interview until the **NC Sturgeon** Legal Department can be contacted. Personnel must not give any work related interviews, affidavits, written or recorded statements, or depositions without the express approval from the **NC Sturgeon** Legal Department.

In the case of interviews of **NC Sturgeon** employees by non-attorneys, (law enforcement, government officials, media, etc) you must inform the Legal Department before the interview. If the interview is taped or videotaped, you must request a copy of the tape. If the interview is reduced to writing, you must ask for a copy of any notes or statements taken. This procedure is to avoid information being misrepresented.

All media requests should be referred to the **NC Sturgeon** Chief Operating Officer. Unless requested to do so by the Legal Department, other company personnel are not to give interviews or make statements to the media. Management prefers that families of personnel involved in an incident receive initial notification from a **NC Sturgeon** representative and not the media.

Training

NC Sturgeon shall ensure training for Emergency Action Plan is delivered, documented and prepares the staff and facility for emergency conditions. **NC Sturgeon** will designate and train employees to assist in a safe and orderly evacuation of other employees. Requirements include:

- All employees must be given adequate instruction in the fire prevention and emergency evacuation procedures applicable to their workplace.
- The designated site representative shall provide the Emergency Action Plan orientation to all new/transferred personnel before they begin work.
- All personnel shall receive a review/update orientation at least annually, or whenever any new/revised information is to be provided.
- The Emergency Action Plan Orientation Check List shall be completed after orientation and the record maintained in the individual's training records.

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- **NC Sturgeon** management shall ensure that contractors/consultants working in areas under the supervision of COMPANY also receive the Emergency Action Plan orientation upon arrival to the area.
- Employees expected to perform duties under the Emergency Action Plan will be trained prior to assuming their roles. This will include simulated rescue or evacuation exercises and regular retraining, appropriate to the type of rescue or evacuation being provided, and training records must be kept.
- A list of trained staff responders shall be posted and maintained indicating their name, response function, their work location and what type of equipment they have been trained for.

Location and Use of Emergency Facilities

NC Sturgeon shall ensure each Emergency Action Plan lists the location and how to use emergency facilities for each work site. For off-site locations, outside services that can provide assistance in the event of an emergency should be identified and reviewed with workers prior to commencing work activities. A list shall be posted in a conspicuous area showing local emergency facilities and how to contact. Examples include:

- Client Emergency Response Department (Initial Responder for All Emergencies If Applicable)
- Local Police, Local Hospital, Poison Center (Poison Response) 1-800-332-1414, etc.

Fire Protection & Response

NC Sturgeon shall ensure each Emergency Action Plan provides fire protection and response planning within each site Emergency Action Plan and is utilized during all phases of work. As a minimum, all shall include the following:

Protection

- Smoking is not permitted except in designated "SMOKING" areas.
- Facilities shall be designed and maintained in accordance with local fire code and regulations.
- Portable fire extinguishers shall be stationed, inspected and maintained in accordance with local fire code and regulations. **NC Sturgeon** personnel shall be trained in their use.
- Flammable and combustible liquids shall be properly stored.
- Employees shall report all fire safety issues to their immediate supervisor.
- Facilities shall be inspected by use of the **NC Sturgeon** Emergency Inspection Checklist

Response

In the event of a fire, personnel working in facility will adhere to the following procedure for their work area:

- Warn others in the immediate area. Notify the appropriate emergency response personnel by phone or radio and pull the nearest fire alarm if present.
- If nearby staff have been trained, and it is safe to do so, fight the fire using a portable fire extinguisher. Remember, if in doubt get out.
- Evacuate the premises via the nearest exit and proceed to the nearest Emergency Assembly Area.
- Re-enter only after the Emergency Coordinator has given an ALL CLEAR.

Roads are designated as fire lanes. Vehicles can stop there for unloading, but no parking will be allowed.

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Alarm & Emergency Communication

Each Emergency Action Plan for **NC Sturgeon** shall contain methods to address alarms and communications in case of an emergency. For off-site locations, the method of emergency notification should be identified and reviewed with workers prior to commencing work activities.

Alarm System

A system must be in place to alert employees. The alarm system shall be distinctive and recognizable as a signal to evacuate the work area or perform actions designated under the emergency action plan. For sites with 10 or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding the alarm provided all employees can hear the alarm. Each Emergency Response plan will describe how to activate an alarm and what to do after either activating or hearing an alarm.

Personnel responding to any alarm shall avoid complacency. Every alarm should be treated as an actual incident until proven otherwise. Treating and responding to alarms as a routine happening can result in injuries, fatalities and destruction of property.

Communications

NC Sturgeon responders and security use telephones, cell phones and radios in conjunction with emergency response.

Rescue and Evacuation Procedures

Procedures for Rescue and Medical Services

Each site Emergency Action Plan shall address who performs rescue services when required. It is the position of **NC Sturgeon** that all rescue and medical duties are performed by client emergency responders or local governmental responders when on their location. For off-site locations, evacuation procedures and methods of rescue shall be identified and reviewed with workers prior to commencing work activities.

At least one member of a rescue team must be a first aid attendant trained to immobilize an injured employee.

Effective communications must be maintained between the employees engaged in rescue or evacuation and support persons.

Procedure for Evacuation

Preparation for Evacuation

Each site Emergency Action Plan shall contain a procedure for evacuation if required.

The **NC Sturgeon** designated Emergency Coordinator will maintain an active list of all COMPANY and contract emergency responders.

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Critical Plant Operations Personnel

Staff designated to remain in the facility to shut down or supervise critical operations or equipment will be specifically trained and authorized by management to perform their duties before any evacuation may occur.

Evacuation Drills

Evacuation drills shall be conducted at least annually. Before conducting an evacuation drill a pre-drill assessment of the evacuation routes and assembly points shall be conducted. The pre-drill assessment is intended to verify that all egress components (stairs, doors, etc.) are in proper order and that occupants can use them safely.

Coordination Within a Facility

Emergency training and drills should also be coordinated within a **NC Sturgeon** facility so that key staff are involved in the planning process and are aware of their responsibilities in an emergency as well as during the drill.

Facility management also needs to be informed of the potential for the interruption in productivity and business operations. Alternatives for the continuity of critical operations need to be considered.

Procedures to Account for All Employees After Evacuation

The emergency action plan must include procedures to account for all employees after the evacuation. An emergency action plan must include at a minimum procedures to account for all employees after evacuation. Each muster or assembly point will have a blank roster for evacuees to enter their name. All completed rosters will be gathered and checked against a master list of employees assigned or checked in at the facility to verify all employees are accounted for.

Emergency Evacuation Notification and Routes

In the event of an emergency occurring within or affecting the work site, the Emergency Coordinator makes the following decisions and ensures the appropriate key steps are taken:

- Advise all personnel of the emergency.
- Activate the emergency notification sequence to alert the appropriate responders and initiate emergency notification within the building.
- Evacuate all persons to the identified assembly area and account for everyone including visitors and clients.

All personnel will proceed to the primary safe area immediately located at the identified emergency assembly area for their location.

A copy of escape routes shall be posted in all offices, at all alarm stations and at all exits.

Sweep Check by **NC Sturgeon** Designated Responders

- **NC Sturgeon** trained responders will establish a pattern that will permit covering the area in the shortest time, with a minimum of backtracking.
- When the evacuation alarm rings, stop work immediately, and conduct a sweep of the area. Ask everyone to leave the premises immediately and proceed to the identified emergency assembly area for their location.
- If you encounter smoke or flame, leave that section immediately, finish your sweep and evacuate the building by activating fire alarm pull stations. Remember, if in doubt get out.

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- If anyone refuses to leave, note their name and location, and advise the client emergency services personnel.
- Meet the client emergency services personnel and advise them of your sweep or an area of smoke or flame that you were unable to check. Assist with head count and evacuation if required.
- Ensure that everyone stays at the emergency assembly area until the Emergency Coordinator has given an all clear to re-enter the building.
- In the event of inclement weather, the client will make arrangements to have buses either as temporary shelter or to transport personnel to another location.

Evacuation or Drill Evaluation

Following an evacuation or drill a response review shall be conducted and documented by the **NC Sturgeon** Emergency Coordinator and lessons learned share with the appropriate responders and staff using the **NC Sturgeon** Evacuation Report.

Emergency Response Program Management

Contact information will be provided to employees who need additional information pertaining to the plan or to their respective duties. The **NC Sturgeon** site manager may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.

For the purpose of this Emergency Action Plan guidance the Emergency Coordinator will be designated by the **NC Sturgeon** site manager. His/her alternate will be the **NC Sturgeon** Site Safety Supervisor or otherwise designated by the site manager.

Employees performing rescue or evacuation must wear personal protective clothing and equipment appropriate to the hazards likely to be encountered.

Duties

NC Sturgeon Emergency Coordinator

The **NC Sturgeon** Emergency Coordinator ensures that:

- Evacuation drills are conducted on an annual basis.
- Inspections of facilities are performed monthly.
- All necessary repairs of components for evacuation paths are completed.
- Plans for the modification of any part of an evacuation path are reviewed.
- An up to date list of Fire Wardens is maintained.
- Radios and reflective vests and other response equipment are available.

During an evacuation or evacuation exercise, the **NC Sturgeon** Emergency Coordinator:

- Coordinates activities in accordance with either local authorities or the client Security and ERT as required.
- Coordinates Fire Wardens and informs them the nature of the emergency via handheld radios.

Following an evacuation or evacuation exercise, the **NC Sturgeon** Emergency Coordinator:

- Notifies Fire Wardens that it is safe to re-enter the building.

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- Prepares a report following an evacuation (actual or drill).
- Reports to management for follow up or corrective actions.

NC Sturgeon Site Safety Supervisor

- Assist the **NC Sturgeon** Emergency Coordinator when requested.

Fire Wardens

- Be equipped with radios and reflective vests. The equipment is to be handed into the **NC Sturgeon** Emergency Coordinator and reissued to the next oncoming Fire Warden for the designated area.
- Be familiar with exits and muster stations for their responsible area.
- Direct residents safely out of the building to the designated muster station or to an alternate location.
- Sweep their effected area, ensuring that the alarms are properly functioning and that residents evacuate safely.
- In order to account for all employees after evacuation the fire wardens or designated personnel shall complete a head count and reconcile the evacuees with the attendance or daily housing report at the assigned muster station or alternate location.
- Radio unaccounted for personnel to Security.
- Notify personnel that they may re-enter the building when permission has been given by the appropriate authorities.

Residents, Contractors & Visitors

- All employees, users, contractors and visitors will follow the instructions of the Fire Wardens, Security, ERT, Safety Personnel, managers and supervisors when asked to evacuate the building.
- Know the two safest and most direct evacuation routes from their work area(s).
- Know the designated evacuation assembly point for the building.

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NC Sturgeon Emergency Inspection Checklist

Department:	Location:	Date of Inspection:
Inspected by:	Title:	Ext:

This form is to be used monthly.

	N/A	Yes	No
EGRESS			
Is every means of egress arranged and clearly marked, so that the way to safety is unmistakable at all times?			
Are exits signs lit?			
Are there sufficient exits for the prompt escape of all employees in case of fire or other emergencies?			
Are doors that aren't exits that could be mistaken as one, clearly marked "Not an Exit"?			
Do exit doors swing out?			
Are means of egress at least 28 inches at any point and adequate width for the number of people?			
Are egresses kept clear of obstructions and materials at all times?			
Is there proper lighting for emergency exiting? (i.e. during a power failure)			
Are at least two exits by separate ways of travel available for each occupant?			
Is the minimum width of any exit way no less than 28 inches?			
Are furnishings and decorations so placed that they will not obstruct the exits, the access thereto, or the egress there from, or the visibility thereof?			
Are explosive and highly flammable furnishings or decorations prohibited?			
EMERGENCIES/EVACUATION			
Are evacuation maps posted in readily accessible places?			
Do employees know where their muster point is located?			
Do employees know area hazards, the nearest exit and alternate routes of escape?			
Do employees know the preferred means of reporting emergencies?			
Do employees know the site emergency number(s)?			
Is the site emergency number posted on or by the phone?			
Do employees know what signal indicates evacuation?			

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This form is to be used monthly.

	N/A	Yes	No
Can all personnel perceive the employee alarm?			
Do employees with special assistance needs been addressed?			
Employees questioned know where the emergency shut off is for the natural gas			
FIRE PROTECTION			
Are fire hydrants accessible?			
Are fire hydrants inspected yearly and records maintained to show the date?			
Are control and operating valves locked open or electronically supervised?			
Are fire hoses maintained and periodically tested?			
Are combustible materials kept away from ignition sources?			
Are standpipe and hose system components visually inspected quarterly?			
Is the accumulation of flammable and combustible materials controlled so they do not contribute to fire emergency?			
All product, supplies, merchandise etc not piled within 18" of Sprinkler heads			
No Combustibles within three feet of Hot Water Tank, Space Heaters and/or Electrical panels			
All Compressed Gas Cylinders tied or chained to eliminate tipping			
DETECTION AND ALARM SYSTEMS			
Are detection systems installed and maintained?			
Are all trouble alarms and fire signals investigated?			
Do detection/alarm systems shut down or reverse HVAC systems for smoke control?			
Do detection/alarm systems close smoke or fire doors?			
Do detection/alarm systems activate local alarms?			
Are alarm and PA systems periodically tested?			
PORTABLE FIRE EXTINGUISHERS			
Does everyone know where the nearest fire extinguisher is stored?			
Has the area fire extinguisher been maintenance tested within the last year and tagged to show the date?			
Are fire extinguishers accessible and the proper type for the fire hazard?			
Are employees trained in how to use fire extinguishers?			
Is there a fire extinguisher mounted within 75 ft of any point in an area?			

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This form is to be used monthly.

	N/A	Yes	No
Are the extinguishers clean and well cared for?			
Is the seal and lock pin in place?			
Clear access to extinguishers? Not blocked			
Is the extinguisher location plainly marked, so as to be visible at a distance?			
Is the extinguisher class marked on the extinguisher?			
FIRST AID / MEDICAL SUPPLIES			
Are first aid supplies stocked, clean, accessible and sanitary?			
Are there eye/body wash facilities near injurious corrosive materials?			
Is a person or persons adequately trained to render first aid available in the near proximity to the workplace?			
Are AEDs present and operators trained?			
Condition of First Aid Kits Acceptable			
Are employees/subcontractors familiar with the incident/accident reporting process?			
Do employees/subcontractors know where accident/incident forms are located?			

Date of last inspection of sprinkler system (required yearly) _____

Comment/Actions:

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NC Sturgeon Evacuation Report

This form is to be used to record all emergency evacuations (including drills).

Building Details

Building Name _____ Number of Floors (including ground) _____
 Designated Muster Station _____ Person Completing Form _____

Evacuation Details

Evacuation Date/Time: _____/_____ Evacuation Drill Yes ☐ No ☐
 Trigger for Evacuation: Fire Alarm Activated ____ Drill ____ ERT ____ Security ____
 Emergency Situation: _____

Condition: Staff Only ____ All Occupants ____ After Hours ____ Unoccupied ____ Weather _____

Number of Evacuees _____ Elapsed Time to Evacuate _____ minutes

Evacuation was orderly with no panic Yes ☐ No ☐
 Mobility-impaired persons present (sight, hearing, physical, etc.)? Yes ☐ No ☐
 The majority of evacuees went to the mustering points? Yes ☐ No ☐
 Were the building occupants notified of this drill? Not a drill ☐ Yes ☐ No ☐

Emergency Control Organization

Emergency Coordinator _____ Deputy Emergency Coordinator _____
 Emergency Coordinators were stationed at the proper emergency control point? Yes ☐ No ☐
 All Fire Wardens reported to the Emergency Coordinator? Yes ☐ No ☐
 If not, who did not report in? _____
 All Fire Wardens were identifiable (vests, hard hats, flash lights)? Yes ☐ No ☐
 Control of external building exits achieved? Yes ☐ No ☐
 Did the Fire Wardens perform their duties correctly? Yes ☐ No ☐
 Evacuation maps and emergency procedures posters are up-to-date? Yes ☐ No ☐

Building Fire & Emergency Equipment

Was the evacuation signal audible throughout the building? Yes ☐ No ☐
 Automatic closing fire doors closed when the fire alarm activated? Yes ☐ No ☐
 Card access doors automatically released when the fire alarm activated? Yes ☐ No ☐
 Fire doors and emergency exits unobstructed? Yes ☐ No ☐

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Emergency Response Members

Client: Maintenance ☐ Security ☐ **NC Sturgeon** Emergency Coordinator ☐ HSE ☐

Emergency Response Team Fire Brigade ☐ Ambulance ☐ Police ☐ Other: _____

NC Sturgeon Action Sheet

Issue(s)	Action(s) Required	By Who	By When	Sign Off/Date

Records

- Keep the original in your Emergency Response folder and monitor to ensure all action items completed as soon as possible. Report delays to senior management.
- Copies shall be distributed in accordance with the **NC Sturgeon** Site Emergency Action Plan.

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Emergency Action Plan Orientation Check List

Employee Name _____ Department _____

Hire/Transfer Date _____ Orientation Date _____

- ☐ Emergency Procedures
- ☐ Evacuation route(s) from assigned work area
- ☐ Evacuation from an unfamiliar area
- ☐ Location of Emergency Assembly Areas
- ☐ Receiving and following instructions during an emergency
- ☐ ALL CLEAR and re-entry procedure
- ☐ Reporting hazards and/or substandard conditions
- ☐ Advising anyone who may require assistance during an emergency evacuation
- ☐ Location of Emergency Equipment (i.e. Fire Extinguishers, etc.)

Employee Signature: _____

Orientation Conducted by: _____

Job Position/Title: _____

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Sample Emergency Action Plan Core Requirements

POTENTIAL EMERGENCIES (BASED ON HAZARD ASSESSMENT)	The following are identified potential emergencies: • Fire • List others	
EMERGENCY PROCEDURES	In the event of a fire occurring within or affecting the work site, the Emergency Coordinator (or deputy) makes the following decisions and ensures the appropriate key steps are taken: • advise all personnel • pull the fire alarm to alert the nearest fire station and initiate all fire alarms within the building • evacuate all persons to a safe point in the assembly area and account for everyone including visitors and clients	
LOCATION OF EMERGENCY EQUIPMENT	Emergency equipment is located at: • Fire Alarm – List • Fire Extinguisher – List • Fire Hose - List	
WORKERS TRAINED IN THE USE OF EMERGENCY EQUIPMENT	(1) _____ (2) _____ (3) _____ (4) _____	
EMERGENCY RESPONSE TRAINING REQUIREMENTS	Type of Training • Use of fire extinguishers • Practice fire drills	Frequency • Orientation and annually • At the call of site management
LOCATION AND USE OF EMERGENCY FACILITIES	The nearest emergency services are located at: • List facilities	



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**FIRE PROTECTION
REQUIREMENTS**

- List all site fire protection requirements.

**ALARM AND EMERGENCY
COMMUNICATION
REQUIREMENTS**

- Pulling the fire alarm automatically alerts the fire department and initiates an alarm within the building
- The fire alarm signal is (describe sound and pattern)

FIRST AID

First aid supplies are located at:

- List

First Aiders are:

- List all names

Transportation for ill or injured workers is by (describe). The contact number or radio channel is (describe).

**PROCEDURES FOR RESCUE
AND EVACUATION**

In case of fire:

- Advise all personnel
- Pull the fire alarm
- Evacuate all persons to a safe point in the staff parking lot and account for everyone including visitors and clients
- Assist ill or injured workers to evacuate the building
- Provide first aid to injured workers if required
- Call emergency response personnel to arrange for transportation of ill or injured workers to the nearest health care facility if required.

**DESIGNATED RESCUE AND
EVACUATION WORKERS**

The following workers are trained in rescue and evacuation (or describe client rescue organization):

- (1) _____
(2) _____
(3) _____
(4) _____

Completed on: _____

Signed: _____

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Purpose

The purpose of this program is to provide fall protection procedures to prevent injury to employees while performing work assignments at elevated levels.

Any changes to this Fall Protection Program must be approved by the HSE Manager, who is designated the Qualified Person. This is based on training received in fall protection planning and has demonstrated skills and knowledge in the preparation of fall programs, plans and the hazards involved.

Scope

Applies to all **NC Sturgeon** employees who have work assignments at work levels that exceed 6 feet in height where guardrails or nets are not utilized. This includes work near and around excavations. Guardrails, safety nets, or personal fall arrest systems shall be used where feasible. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

"Anchorage" means a secure point of attachment for lifelines, lanyards or deceleration devices.

"Body belt (safety belt)" means a strap with means both for securing it about the waist and for attaching it to a lanyard, lifeline, or deceleration device.

"Body harness" means straps which may be secured about the employee in a manner that will distribute the fall arrest forces over at least the thighs, pelvis, waist, chest and shoulders with means for attaching it to other components of a personal fall arrest system.

"Buckle" means any device for holding the body belt or body harness closed around the employee's body.

"Carabineer" - see Snaphook

"Connector" means a device which is used to couple (connect) parts of the personal fall arrest system and positioning device systems together. It may be an independent component of the system, such as a carabineer, or it may be an integral component of part of the system (such as a buckle or D-ring sewn into a body belt or body harness, or a snap-hook spliced or sewn to a lanyard or self-retracting lanyard).

"Deceleration device" means any mechanism, such as a rope grab, rip-stitch lanyard, specially-woven lanyard, tearing or deforming lanyards, automatic self-retracting lifelines/lanyards, etc., which serves to dissipate a substantial amount of energy during a fall arrest, or otherwise limit the energy imposed on an employee during fall arrest.

"Deceleration distance" means the additional vertical distance a falling employee travels, excluding lifeline elongation and free fall distance, before stopping, from the point at which the deceleration device begins to

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operate. It is measured as the distance between the location of an employee's body belt or body harness attachment point at the moment of activation (at the onset of fall arrest forces) of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.

"Equivalent" means alternative designs, materials, or methods to protect against a hazard which the employer can demonstrate will provide an equal or greater degree of safety for employees than the methods, materials or designs specified in the standard.

"Failure" means load refusal, breakage, or separation of component parts. Load refusal is the point where the ultimate strength is exceeded.

"Free fall" means the act of falling before a personal fall arrest system begins to apply force to arrest the fall.

"Free fall distance" means the vertical displacement of the fall arrest attachment point on the employee's body belt or body harness between onset of the fall and just before the system begins to apply force to arrest the fall. This distance excludes deceleration distance, and lifeline/lanyard elongation, but includes any deceleration device slide distance or self-retracting lifeline/lanyard extension before they operate and fall arrest forces occur.

"Guardrail system" means a barrier erected to prevent employees from falling to lower levels.

"Infeasible" means that it is impossible to perform the inspection work using a conventional fall protection system (i.e., guardrail system, safety net system, or personal fall arrest system) or that it is technologically impossible to use any one of these systems to provide fall protection.

"Lanyard" means a flexible line of rope, wire rope, or strap which generally has a connector at each end for connecting the body belt or body harness to a deceleration device, lifeline, or anchorage.

"Leading edge" means the edge of a floor, roof, or formwork for a floor or other walking/working surface (such as the deck) which changes location as additional floor, roof, decking, or formwork sections are placed, formed, or constructed. A leading edge is considered to be an "unprotected side and edge" during periods when it is not actively and continuously under construction.

"Lifeline" means a component consisting of a flexible line for connection to an anchorage at one end to hang vertically (vertical lifeline), or for connection to anchorages at both ends to stretch horizontally (horizontal lifeline), and which serves as a means for connecting other components of a personal fall arrest system to the anchorage.

"Lower levels" means those areas or surfaces to which an employee can fall. Such areas or surfaces include, but are not limited to, ground levels, floors, platforms, ramps, runways, excavations, pits, tanks, material, water, equipment, structures, or portions thereof.

"Personal fall arrest system" means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body belt or body harness and may include a lanyard, deceleration device, lifeline, or suitable combinations of these.

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"Positioning device system" means a body belt or body harness system rigged to allow an employee to be supported on an elevated vertical surface, such as a wall, and work with both hands free while leaning.

"Rope grab" means a deceleration device which travels on a lifeline and automatically, by friction, engages the lifeline and locks so as to arrest the fall of an employee. A rope grab usually employs the principle of inertial locking, cam/level locking, or both.

"Safety Nets...Safety nets shall be provided when workplaces are higher than 25 feet above ground or water surfaces or other surfaces where the use of ladders, scaffolds, catch platforms, temporary floors, safety lines or safety belts are impractical.

Nets shall extend 8 feet beyond the edge of the work surface where employees are exposed and shall be installed as close under the work surface as practical but in no case more than 25 feet below the work surface. Nets shall be positioned in a manner to prevent the user from coming into contact with below surfaces or structures. Proper clearance positioning of nets shall be determined by impact load testing. Work procedures shall not begin until nets are in place and have been properly tested.

New nets shall meet accepted performance standards of 17,500 foot pounds minimum impact resistance as determined and certified by the manufacturers and shall bear a label of proof test. Edge ropes shall provide a minimum breaking strength of 5000 pounds.

"Self-retracting lifeline/lanyard" means a deceleration device containing a drum-wound line which can be slowly extracted from, or retracted onto, the drum under slight tension during normal employee movement, and which, after onset of a fall, automatically locks the drum and arrests the fall.

"Snaphook" means a connector comprised of a hook-shaped member with a normally closed keeper, or similar arrangement, which may be opened to permit the hook to receive an object and, when released, automatically closes to retain the object. Snaphooks are generally one of two types: (1) The locking type with a self-closing, self-locking keeper which remains closed and locked until unlocked and pressed open for connection or disconnection; or (2) The non-locking type with a self-closing keeper which remains closed until pressed open for connection or disconnection. As of January 1, 1998, the use of a non-locking snaphook as part of personal fall arrest systems and positioning device systems is prohibited.

"Unprotected sides and edges" means any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39 inches (1.0 m) high.

"Walking/working surface" means any surface, whether horizontal or vertical on which an employee walks or works, including, but not limited to, floors, roofs, ramps, bridges, runways, formwork and concrete reinforcing steel but not including ladders, vehicles, or trailers, on which employees must be located in order to perform their job duties.

"Work area" means that portion of a walking/working surface where job duties are being performed.

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Drawing of Components



Figure A

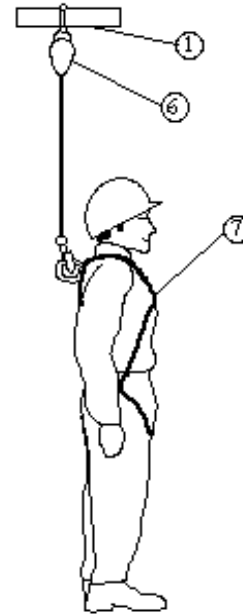


Figure B

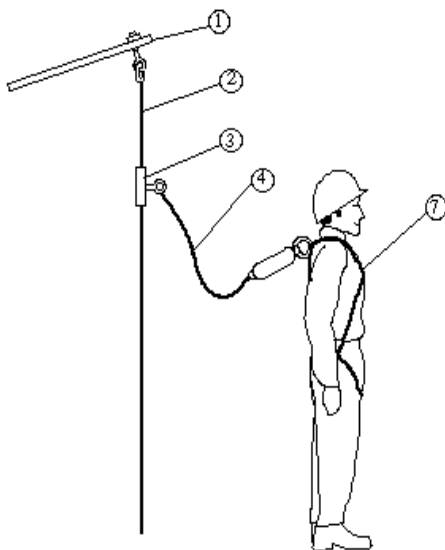


Figure C

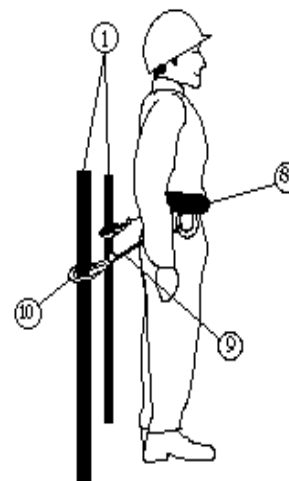


Figure D

1. Tie-off Point
2. Lifeline
3. Rope Grab
4. Shock Absorbing Lanyard
5. Cross-Arm Strap
6. Retractable Lifeline
7. Full-Body Harness
8. Restraining Belt
9. Restraining Lanyard
10. Carabineer

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Responsibilities

Operations Manager

It is the responsibility of the local operations manager (designated competent person) to implement this Fall Protection Program. Continual observational safety checks of work operations and the enforcement of the safety policy and procedures shall be regularly enforced. All jobs shall be pre-planned prior to the start of work.

Supervisor

The Supervisor shall ensure that all persons assigned to work at elevated levels, exceeding 6 feet in height or more above lower level and where guardrails or nets are not utilized, be protected by personal fall protection equipment.

- Supervisors shall make exposure determinations and shall discuss with their employees the extent to which scaffolds, ladders or vehicle mounted work platforms can be used.
- Ensure that fall protection equipment is available and in safe working condition.
- Provide for emergency rescue in the event of a fall. Pre-plan the job to ensure that employees have been properly trained in the use, limitations, inspections and rescue procedures and that training records are on file.

Employees

Employees shall ensure they have and use the fall protection equipment as required by this program and:

- Understand the potential hazards of working at elevated levels as well as gaining access to and from the work location.
- Understand the use and limitations of such equipment.
- Pre-plan the job with his/her supervisor to agree that the job can be done safely.
- Inspect such equipment before each use and to report defective equipment immediately to their supervisor.

Procedure

Fall protection is required whenever employees are potentially exposed to falls from heights of six feet or greater to lower levels. This includes work near and around excavations. Use of guard rails, safety net, or personal fall arrest systems should be used when the standard methods of protection are not feasible or a greater hazard would be created.

When purchasing equipment and raw materials for use in fall protection systems applicable ANSI, ASTM or OSHA approved equipment shall be used.

Minimum Standards

The following are minimum standards for **NC Sturgeon** employee personal fall protection systems:

- All D-rings must be a minimum of 2¼ inches (inside diameter).
- All snap hooks shall not allow pressure to be applied to the gate in the opening direction.
- No pelican hooks on lanyards should be used as a primary connection.

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- Connectors shall be drop forged, pressed or formed steel, or made of equivalent materials.
- Connectors shall have a corrosion-resistant finish, and all surfaces and edges shall be smooth to prevent damage to interfacing parts of the system.
- D-rings and snap hooks shall have a minimum tensile strength of 5,000 pounds.
- D-rings and snap hooks shall be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.
- Snap hooks shall be sized to be compatible with the member to which they are connected to prevent unintentional disengagement of the snap hook. Only a locking type snap hook designed and used to prevent disengagement of the snap hook by the contact of the snap hook keeper by the connected member shall be used.
- Horizontal lifelines shall be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.
- Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds. Where vertical lifelines are used, each employee shall be attached to a separate lifeline.
- Lifelines shall be protected against being cut or abraded.
- Self-retracting lifelines and lanyards which automatically limit free fall distance to 2 feet or less shall be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Self-retracting lifelines and lanyards which do not limit free fall distance to 2 feet or less, rip stitch lanyards, and tearing and deforming lanyards shall be capable of sustaining a minimum tensile load of 5,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per employee attached, or shall be designed, installed, and used as part of a complete personal fall arrest system which maintains a safety factor of at least two and under the supervision of a qualified person.
- Systems used by an employee having a combined person and tool weight in excess of 310 pounds shall be modified to provide proper protection for such heavier loads.
- The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level, or above the wearer's head, except when climbing.
- Body harnesses and components shall be used only for employee protection and not to hoist materials.
- Personal fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection until inspected and determined by a competent person to be undamaged and suitable for reuse.
- Provide for prompt rescue of employees in the event of a fall or assure that employees are able to rescue themselves.
- Personal fall arrest systems shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.
- Personal fall arrest systems shall not be attached to guardrail systems, nor shall they be attached to hoists unless prior approval is obtained from a competent person.
- If and when a personal fall arrest system is used at hoist areas, it shall be rigged to allow the movement of the employee only as far as the edge of the walking/working surface.

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Stopping a Fall

The arresting force on an employee stopped by a fall shall be limited to a maximum arresting force of 1,800 pounds when wearing a body harness.

The fall arrest system shall be rigged such that an employee can neither free fall more than 6 feet, nor contact any lower level.

The fall arrest system shall bring an employee to a complete stop and limit maximum deceleration distance an employee travels to 3.5 feet.

The fall arrest system shall have sufficient strength to withstand twice the potential impact energy of an employee free falling a distance of 6 feet, or the free fall distance permitted by the system, whichever is less.

Protection From Falling Objects

When employees are required to work in the near vicinity of others working with materials, tools, or equipment at elevated levels, Barricades around the immediate area of the overhead work shall be erected to prohibit employees from entering the barricaded area.

Employees performing work at elevated levels shall keep tools, materials, and equipment away from the edge to keep potential objects from falling over the side. Where practical, tools, etc. shall be secured with rope, wire, etc. to keep them from falling.

Portable Ladders

Three point climbing is required while ascending/descending ladders. While on ladders, both hands and one foot, or both feet and one hand shall always be in contact with the ladder.

Tools required to perform a task shall be transported by a mechanical carrier such as a tag line, suspended bucket or tool belt.

- Tools shall not be carried by hand while climbing.
- Hands must be free to grip the ladder.
- Tools shall not be carried in clothing pockets.
- Tools shall be pulled up to the job site only after reaching the area of work.

When work is to be performed from straight/extension ladders, fall protection shall be utilized when heights exceed 6 feet.

Straight ladders shall be tied off at the top to prevent them from moving. A second person shall steady the ladder at the base while it is being tied off at the top by another employee. Do not tie off fall protection equipment to the ladder.

Storage

A dedicated storage area shall be provided for the storage of fall protection equipment and all components. The storage area shall keep the equipment clean, dry, and free from oils, chemicals, paints, and excessive heat.

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Inspections

Fall protection equipment shall be inspected before each use for wear, damage, other deterioration, or other defects.

Elevated Personnel Platforms

Work performed, regardless of the nature of the work, from personnel platforms raised by forklifts, cranes, scissor lifts, etc., shall require the use of a full body harness and shall be connected to the platform.

Rescue

Prompt rescue of employees shall be provided in the event of a fall or shall assure the employees are able to rescue themselves. The pre-planning stage prior to the beginning of each elevated work assignment shall be evaluated by the supervisor to provide rescue of employees involved in a fall.

Fall Protection Plan

This option is available only to employees engaged in leading edge work who can demonstrate that it is infeasible or it creates a greater hazard to use conventional fall protection equipment. The fall protection plan shall conform to the following provisions:

- The fall protection plan shall be prepared by a qualified supervisor and developed specifically for the site where the leading edge work is being performed.
- The fall protection plan shall document the reasons why the use of conventional fall protection systems (guardrail systems, personal fall arrest systems, or safety net systems) are infeasible or why their use would create a greater hazard.
- The fall protection plan shall identify each location where conventional fall Protection methods cannot be used.
- These locations shall then be classified as controlled access zones.

Controlled Access Zones

When used to control access to areas where leading edge or other operations are taking place the controlled access zone shall be defined by a control line or by any other means that restricts access.

When control lines are used, they shall be erected not less than 6 feet (1.8 m) nor more than 25 feet (7.7 m) from the unprotected or leading edge.

The control line shall extend along the entire length of the unprotected or leading edge and shall be approximately parallel to the unprotected or leading edge.

The control line shall be connected on each side to a guardrail system or wall.

- Control lines shall consist of ropes, wires, tapes, or equivalent materials.

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- Each line shall be flagged or otherwise clearly marked at not more than 6-foot (1.8 m) intervals with high-visibility material.
- Each line shall be rigged and supported in such a way that its lowest point (including sag) is not less than 39 inches (1 m) from the walking/working surface and its highest point is not more than 45 inches (1.3 m).
- Each line shall have a minimum breaking strength of 200 pounds.

Only employees engaged in the related work shall be permitted in the controlled access zone.

Safety Monitoring System

When the use of conventional fall protection equipment is deemed infeasible or the use of this equipment creates a greater hazard a Fall Protection Plan which includes a safety monitoring system shall be implemented by the supervisor.

Supervisors shall designate a competent person to monitor the safety of other employees. The competent person shall be assigned to:

- Recognize fall hazards;
- Warn employees if they are unaware of fall hazard or are acting in an unsafe manner;
- Be on the same working surface and in visual contact of working employees;
- Stay close enough for verbal communication; and
- Not have other assignments that would take his/her attention from the monitoring function.

Incident Investigations

All incidents and near misses must be investigated according to **NC Sturgeon's** incident investigation procedure. Changes to the fall protection program shall be implemented if deemed appropriate from incident corrective actions.

Training

Employees who might be exposed to fall hazards shall be trained to enable each employee to recognize the hazards of falling and in the procedures to follow to minimize these hazards.

The employee will be trained in the use and operation of fall arrest systems, inspections, and maintenance procedures.

Training must be conducted initially and refresher training conducted annually or as needed due to deficiencies in training, changes in the workplace, changes in fall protection systems or procedures that render previous training obsolete or inadequacies in an employee's understanding of previous training.

Training must be documented in writing. Written certification shall include:

- Who was trained
- When and dates of training

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- Signature of person providing training
- Date training was deemed adequate by **NC Sturgeon**

Training records shall be retained in the corporate office.

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Purpose

The purpose of this program is to provide fire extinguisher procedures to ensure equipment is operable and employees have the knowledge to safely operate in case of a fire incident.

Scope

Applies to all COMPANY employees and all **NC Sturgeon** locations.

Responsibilities

The Safety Manager is responsible for developing procedures for the use and care of fire extinguishers and for developing a training program for the proper use of these devices. The Manager is responsible for implementing fire extinguisher training at his location. The shop foremen are responsible for enforcing the provisions of this section of the safety manual. All employees are responsible for following these provisions.

Procedure

Selection and Distribution

Portable fire extinguishers shall be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of the hazard which would affect their use. Fire extinguishers used by this company are for four classes of fires:

- Class A Fire Extinguishers. Use on ordinary combustibles or fibrous material, such as wood, paper, cloth, rubber and some plastics. Travel distance for employees to any extinguisher is 75 feet (22.9 m) or less.
- Class B Fire Extinguishers. Use on flammable or combustible liquids such as gasoline, kerosene, paint, paint thinners and propane. Travel distance from the Class B hazard area to any extinguisher is 50 feet (15.2 m) or less.
- Class C Fire Extinguishers. Use on energized electrical equipment, such as appliances, switches, panel boxes and power tools. Travel distance from the Class C hazard area to any extinguishing agent is 50 feet (15.2 m) or less.
- Class D Fire Extinguishers. Use on combustible metals, such as magnesium, titanium, potassium and sodium. Travel distance from the combustible metal working area to any extinguishing agent is 75 feet (22.9 m) or less.

Labelling Of Fire Extinguishers

Fire extinguishers are to be mounted in easily accessible locations that are indicated by a sign that reads "Fire Extinguisher". Fire extinguishers are to be located so that no employee will ever be more than 75 feet from an extinguisher. No equipment, boxes or product may be placed (even temporarily) in the way of a fire extinguisher. Each fire extinguisher will be assigned a unique number.

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Maintenance

All fire extinguishers shall be mounted no higher and no lower than four (4) feet from the floor. All fire extinguishers shall be maintained as follows:

- Numbered to identify their proper location
- Fully charged and in operable condition
- Clean and free of defects
- Readily accessible at all times

Inspection, Maintenance and Testing

All fire extinguishers are to be visually inspected by **NC Sturgeon** employees monthly. All fire extinguishers are to receive an annual maintenance check by certified personnel from a fire extinguisher dealer. Fire extinguishers are to be inspected and re-charged by certified personnel after any use.

Any fire extinguisher that shows a loss of pressure during the monthly inspection will be inspected and re-charged by certified personnel. Completed fire extinguisher inspection logs will be maintained in the safety files and become a part of the safety records. They are to be maintained for 5 years.

Use

In the event of a fire, one employee will get the nearest fire extinguisher and use it to attempt to put the fire out. All other employees in the immediate area will prepare to evacuate if needed. All other employees in the building need to be advised that a fire is in progress.

The employee attempting to extinguish the fire will break the safety seal on the handle and pull the pin. He will then aim his extinguisher at the base of the fire and discharge it with a sweeping motion from side to side; continuing until the fire is out or the extinguisher is emptied.

Remember that a standard fire extinguisher will be emptied in about 10 to 15 seconds. If the fire is not out when the extinguisher has been completely discharged, the employees must evacuate the area.

Training and Education

The purpose of this section is to establish training procedures which are necessary for the proper use and understanding of a fire extinguisher and incipient stage fire fighting. Training will occur prior to initial assignment and at least annually thereafter.

On even numbered years this training will be conducted by a member of the local fire department (where possible) and will include "live fire" hands on use of the extinguisher. On odd number years this training will be conducted by the Safety Manager and will include a demonstration of the use of a fire extinguisher, without actually discharging the unit.

New employees will be given the odd number year training upon hire.

Initial Training Outline

- General principles of a fire

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- Hazards employed with an incipient stage fire(s)
- When to "back off" (evacuate) of an incipient stage fire(s)
- General fire principles of a fire extinguisher
- Hazards employed with the use a fire extinguisher
- Use of a fire extinguisher

Retraining

Retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary. Retraining shall be provided for all authorized and affected employees whenever there is:

- An annual basis or
- A change in job assignment or
- **NC Sturgeon** has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of fire extinguishers or fire prevention procedures.

Training Documentation

- All training will be documented and each employee's understanding will be subject to a "hands-on" test.
- Documentation will consist of; as a minimum, the employee's name, the trainer's name, the date of the training, and an outline of training provided.

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Purpose

The purpose of this program is to establish the minimum first aid supplies, equipment and actions to properly respond to injuries.

Scope

This program is applicable to all **NC Sturgeon** employees while engaged in work at **NC Sturgeon** facilities and/or facilities operated by others.

Responsibilities

- It is the responsibility of the site manager to ensure that first aid kits are provided and maintained.
- All employees are responsible for using first aid materials in a safe and responsible manner.
- The HSE Manager is responsible for corresponding with the Red Cross or an equivalent to keep employee training levels current.

Requirements

Planning

The site manager will:

- Ensure that a minimum of one employee, with a valid certificate, shall be present to render first aid at all times work is being performed if medical assistance is not available within 3-4 minutes.
- Ensure that provisions shall have been made prior to commencement of a project for prompt medical attention, including transportation, in case of serious injury.
- Ensure adequate first aid supplies and equipment are easily accessible when required.
- Ensure that in areas where 911 is not available, the telephone numbers of the physicians, hospitals, or ambulances to be used shall be conspicuously posted.

Medical Response

All minor first aid is to be self rendered. Because of the risks presented by certain bloodborne pathogens, no one is allowed to tend the minor injuries of another.

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 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.

Employees authorized to render first aid will always observe universal precautions. (Universal Precautions means that the aid giver treats all bodily fluids as if they were contaminated).

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If 911 is not available refer to the list of posted phone numbers for prearranged medical response providers. All **NC Sturgeon** authorized first responders shall have a cell phone as a means of communications; otherwise hand held radios or telephones shall be used as a means of communication.

Supplies and Equipment

First aid supplies shall be easily accessible when required. Always follow the manufacturer's instructions when using the materials in the first aid kit.

All **NC Sturgeon** first aid kits contain appropriate items determined to be adequate for the environment in which they are used and if on a construction site are stored in a weather proof container with individual contents sealed from the manufacturer for each type of item.

NC Sturgeon is responsible to ensure the availability of adequate first aid supplies and to periodically reassess the availability for supplies and to adjust its inventories. First Aid kits are to be inspected:

- On the first working day of each week to verify that they are fully stocked and that no expiration dates have been exceeded, and
- Before being sent out to each job, and
- Replace any items that have exceeded their expiration dates or that have been depleted.

Where the eyes or body of any person may be exposed to injurious corrosive materials, a safety shower and/or eye wash (suitable facilities) or other suitable facilities shall be provided within the work area. Ensure expiration dates are checked and water used in storage devices is sanitized.

An assessment of the material or materials used shall be performed to determine the type flushing/drenching equipment required. At client job sites, portable or temporary stations must be established prior to the use of corrosive materials.

Transportation

Based on the first responder's assessment of the injuries involved, decide whether the injured requires to be taken directly to a hospital's emergency room, occupational medicine provider or administer first aid on location.

Examples of serious injuries that result in the injured being transported to a medical provider are those resulting in severe blood loss, possible permanent disfigurement, head trauma, spinal injuries, internal injuries and loss of consciousness. Keep in mind that the needs and well being of the injured are the first priority.

Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service shall be provided.

Choices to consider include: private automobile, company vehicle, helicopter, crew boat, EMS vehicles including medi-vac helicopters, or any other transportation that can provide safe transportation to the hospital or doctors office in order to provide medical attention to the injured in the quickest manner without any additional complications or injuries to the injured employee.

Transportation needs must be preplanned and coordinated with the transportation provider prior to an incident

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requiring such service.

Training

Volunteers or selected employees are trained by the American Red Cross or equivalent in CPR and first aid. Each of these trained and certified employees are equipped with protective gloves and other required paraphernalia. CPR training must be re-certified annually and first aid training must be re-certified every three years.

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Purpose

The purpose of this program is to establish requirements for the safe operation and use of Powered Industrial Trucks.

Scope

This program applies to all **NC Sturgeon** employees who operate a Powered Industrial Truck in the scope of their job duties and assignments. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. *NOTE:* All employees are required to be trained and certified prior to operating each specific type of forklift equipment. **NC Sturgeon** shall certify all authorized employees regarding competency on all types of equipment.

Definitions

Authorized Employee – A person, at least 18 years of age and who has completed the company's required safety training for the safe operations of forklifts.

Forklift (Powered Industrial Truck) – Any mechanical device used for the movement of supplies, material or finished a product that is powered by an electric motor or an internal combustion engine.

Key Responsibilities

Manager/Supervisor

- Shall ensure that each powered forklift operator is competent to operate a forklift safely, as demonstrated by the successful completion of the training and evaluation program.
- Shall ensure that all forklifts are inspected before each shift and all repairs are made before the forklift is operated.

Employees

- Shall be current on applicable training.
- Operate forklift in accordance to the forklift standards and manufacture requirements.
- Inspect forklift at the start of shift, and remove from service if defects are found until they are corrected.
- Operate forklift in a safe manner.

Procedure

General

All approved forklifts shall have a manufactures identification plate attached showing all specifications of the forklift and that the forklift is accepted by a nationally recognized testing laboratory.

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Modifications and additions, that affect capacity and safe operation, shall not be performed without manufacturer's prior written approval. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed reflect the modification or addition.

If the forklift is equipped with front-end attachments other than factory installed attachments, the supervisor shall ensure that the forklift is marked to identify the attachments and show the approximate weight of the forklift and attachment combination at maximum elevation with load laterally centered.

The operator shall see that all nameplates and markings are in place and are maintained in a legible condition.

All forklifts shall be equipped with safety seat belts. All forklifts shall be equipped with a horn, backup alarm, beacon light, headlights and taillight.

Safety Guards

Forklifts shall be fitted with an overhead rollover cage, as per manufactures specifications.

If the type of load presents a hazard to the operator, the forklift shall be equipped with a vertical load backrest extension, as per manufactures specifications.

Training

Training shall consist of a combination of formal instruction (e.g., lecture, discussion, interactive computer learning, video tape, written material), practical training (demonstrations performed by the trainer and practical exercises performed by the trainee) and evaluation of the operator's performance in the workplace.

All operator training and evaluation shall be conducted by authorized persons who have the knowledge, documented training, and experience to train powered industrial truck operators and evaluate their competence.

Each operator is required to be re-evaluated every three years.

Training shall include the following topics, except in topics for locations where they are not applicable to safe operation of the truck due to type of equipment or facility conditions.

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,

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13. 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,
14. Surface conditions where the vehicle will be operated,
15. Composition of loads to be carried and load stability,
16. Load manipulation, stacking, and unstacking,
17. Pedestrian traffic in areas where the vehicle will be operated,
18. Narrow aisles and other restricted places where the vehicle will be operated,
19. Hazardous (classified) locations where the vehicle will be operated,
20. Ramps and other sloped surfaces that could affect the vehicle's stability,
21. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust,
22. Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation, and
23. The requirements of CFR 1910.178 (Powered Industrial Trucks).

Mandatory refresher training shall be provided when unsafe operations are observed, after an incident, if operating a different vehicle type, changes in conditions or any time **NC Sturgeon** feels an operator requires refresher training.

Certification

The trainer shall certify in writing that each operator has been trained and evaluated as required.

The certification shall include the name of the operator, the date of the training, the date of the evaluation and the identity of the person(s) performing the training and/or evaluation.

Operations

General

- All operators shall wear a safety seat belt when operating a forklift.
- Forklifts 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 forklift, whether loaded or empty.
- Unauthorized personnel shall not be permitted to operate forklifts.
- No riders or passengers are permitted.
- It is prohibited for arms or legs to be placed between the uprights of the mast or outside the running lines of the forklift.
- When a forklift 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 forklift is parked on an incline.
- A forklift is unattended when the operator is 25 ft. or more away from the vehicle, which remains in view, or whenever the operator leaves the forklift and it is not in view.
- When the operator of a forklift is dismounted and within 25 ft. of the forklift still in view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement.

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- A safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock, or platform or freight car.
- Forklifts shall not be used for opening or closing freight doors.
- Brakes shall be set and wheel blocks shall be in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading.
- Fixed jacks may be necessary to support a semi trailer during loading or unloading when the trailer is not coupled to a tractor.
- The flooring of trucks, trailers, and railroad cars shall be checked for breaks and weakness before they are driven onto.
- There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
- An overhead guard (cages) shall be used as protection against falling objects.
- 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.
- Fire aisles, access to stairways, and fire equipment shall be kept clear.

Traveling

- The operator shall slow down and sound the horn at cross isles and other locations where vision is obstructed.
- If the load being carried obstructs forward view, the operator shall be required to travel with the load trailing.
- The operator 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 forklifts 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 forklift shall be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay are prohibited.
- The operator shall slow down for wet and slippery floors.
- Dock board or bridge plates shall be properly secured before they are driven over.
- Dock board or bridge plates shall be driven over carefully and slowly and their rated capacity never exceeded.
- 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.

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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 forklift shall be handled.
- Forklifts equipped with attachments shall be operated as partially loaded forklifts 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.

Operation of the Truck

- If at any time a forklift is found to be in need of repair, defective, or in any way unsafe, the forklift shall be taken out of service until it has been restored to safe operating condition.
- Fuel tanks shall not be filled while the engine is running.
- Spillage of oil or fuel shall be carefully washed away or completely evaporated and the fuel tank cap replaced before restarting engine.
- When fueling with Liquefied Petroleum Gas (LPG), precautions and handling requirements set forth in the "Safe Handling of LPG" program shall be followed.
- No forklift shall be operated with a leak in the fuel system.
- Open flames shall not be used for checking electrolyte level in storage batteries or gasoline level in fuel tanks.
- Operator must verify trailer chocks, supports, and dock plates are secured prior to loading/unloading.

Maintenance of Forklifts

- Only authorized personnel shall perform maintenance, and make repairs.
- Those repairs to the fuel and ignition systems of forklifts, which involve fire hazards, shall be conducted only in locations designated for such repairs.
- Forklifts in need of repairs to the electrical system shall have the battery disconnected prior to such repairs.
- Only parts equivalent with those used in the original design shall replace all parts of any forklift requiring replacement parts.
- Forklifts 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.

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- Additional counter weighting of fork trucks shall not be done unless approved by the truck manufacturer.
- Forklifts shall be inspected before being placed in service, and shall not be placed in service if the inspection shows any condition adversely affecting the safety of the forklift.
- Inspection shall be made at least daily – prior to each shift. (visual – non documented) Inspection items shall be posted on each forklift. Operators must insure the vehicle is safe prior to operating.
- Where forklifts are used on a round-the-clock basis, they shall be inspected before each shift.
- Defects when found shall be immediately reported to the supervisor, and corrected before operating the forklift.
- When the temperature of any part of any forklift is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the forklift shall be removed from service and not returned to service until the cause for such overheating has been eliminated.
- Forklifts shall be kept in a clean condition, free of lint, excess oil, and grease.
- Noncombustible agents, where at all possible, shall be used for cleaning trucks.
- Low flash point (below 100 degrees F.) solvents shall not be used.
- High flash point (at or above 100 degrees F.) solvents may be used if precautions regarding toxicity, ventilation, and fire hazard are mitigated with the agent or solvent used.

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Purpose

The purpose of this program is to provide establish requirements for the safe operation of hand and power tools and other portable tools, including proper guarding. All hand and power tools shall be maintained in a safe condition.

This program applies to all **NC Sturgeon** employees who use hand and power tools.

Scope

This program is applicable to all **NC Sturgeon** employees while engaged in work at **NC Sturgeon** facilities and/or facilities operated by others.

Responsibilities

Any tool which is not in compliance with any applicable requirement of this plan is prohibited and shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

Managers/Supervisors

- Ensure that all employees using portable tools have been trained and fully understand the operations and maintenance procedures of such tools, including their proper use.
- Provide and train employees with all additional PPE that may be needed for the safe operation of portable tools.

Employees

- Shall ensure they have and properly use the correct tool for each task.
- Shall follow manufactures safety and operating instructions before using

Requirements

General

All tools, regardless of ownership, shall be of an approved type and maintained in good condition.

- Tools are subject to inspection at any time.
- All employees have the authority and responsibility to condemn unsafe tools, regardless of ownership.

Unsafe tools shall be tagged with a "DO NOT USE OR OPERATE" tag to prevent their use.

Employees shall always use the proper tool for the job to be performed. Makeshift and substitute tools shall not

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be used.

Hammers with metal handles, screwdrivers with metal continuing through the handle, and metallic measuring tapes shall not be used on or near energized electrical circuit or equipment.

Tools shall not be thrown from place to place or from person to person; tools that must be raised or lowered from one elevation to another shall be placed in tool bags/buckets firmly attached to hand lines.

Tools shall never be placed unsecured on elevated places.

Impact tools such as chisels, punches, and drift pins that become mushroomed or cracked shall be dressed, repaired, or replaced before further use.

Chisels, drills, punches, ground rods, and pipes shall be held with suitable holders or tongs (not with the hands) while being struck by another employee.

Shims shall not be used to make a wrench fit.

Wrenches with sprung or damaged jaws shall not be used.

Tools shall be used only for the purposes for which they have been approved.

Tools with sharp edges shall be stored and handled so that they will not cause injury or damage. They shall not be carried in pockets unless suitable protectors are in use to protect the edge. They shall not be carried in pockets unless suitable protectors are in use to protect the edge.

Wooden handles that are loose, cracked, or splintered shall be replaced. The handle shall not be taped or lashed with wire. The handle shall not be taped or lashed with wire.

Tools shall not be left lying around where they may cause a person to trip or stumble.

When working on or above open grating, a canvas or other suitable covering shall be used to cover the grating to prevent tools or parts from dropping to a lower level where others are present or the danger area shall be barricaded or guarded.

The insulation on hand tools shall not be depended upon to protect users from high voltage shock (except approved live line tools).

Portable Electric Tools

The non-current carrying metal parts of portable electric tools such as drills, saws, and grinders shall be effectively grounded when connected to a power source unless:

- The tool is an approved double-insulated type, or
- The tool is connected to the power supply by means of an isolating transformer or other isolated power

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supply.

All powered tools shall be examined prior to use to ensure general serviceability and the presence of all applicable safety devices.

Powered tools shall be used only within their design and shall be operated in accordance with manufacturer's instructions. The use of electric cords for hoisting or lowering tools shall not be permitted.

All tools shall be kept in good repair and shall be disconnected from the power source while repairs or adjustments are being made.

Electrical tools shall not be used where there is hazard of flammable vapors, gases, or dusts without a valid Hotwork Permit.

Ground fault circuit interrupters or use of an Assured Grounding Program shall be used with portable electric tools. This does not apply to equipment run off of portable or truck mounted generators at 5kw or less that are isolated from ground or to equipment ran directly off of secondaries.

Pneumatic Tools

Pneumatic tools shall never be pointed at another person.

Pneumatic power tools shall be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.

Safety clips or retainers shall be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled.

Compressed air shall not be used for cleaning purposes, except where reduced to less than 30 psi and then only with effective chip guarding and personal protective equipment.

Compressed air shall not be used to blow dust or dirt from clothing.

The manufacturers stated safe operating pressure for hoses, pipes, valves, filters, and other fitting shall not be exceeded.

The use of hoses for hoisting or lowering tools shall not be permitted.

Before making adjustments or changing air tools, unless equipped with quick-change connectors, the air shall be shut off at the air supply valve ahead of the hose. The hose shall be bled at the tool before breaking the connection.

Compressed air tools, while under pressure, must not be left unattended.

All connections to air tools shall be made secure before turning on air pressure.

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Air at the tool shall not be turned on until the tool is properly controlled.

All couplings and clamps on pressurized air hose shall be bridged (pinned) with suitable fasteners.

Hose and hose connections used for conducting compressed air to utilization equipment shall be designed for the pressure and service to which they are subjected.

Use only approved end-fitting clamps (screw type heater hose clamps are not acceptable).

While blowing down hose, do not point it toward people.

Power tools are to be operated only by competent persons who have been trained in their proper use.

Conductive hose should not be used near energized equipment.

Foot protection shall be worn while operating paving breakers, tampers, rotary drills, clay spades, and similar impactor-type tools or at other times when instructed by supervision.

All pneumatically driven nailers, staplers, and other similar equipment provided with automatic fastener feed, which operate at more than 100 psi. pressure at the tool shall have a safety device on the muzzle to prevent the tool from ejecting fasteners, unless the muzzle is in contact with the work surface.

Airless spray guns of the type which atomize paints and fluids at high pressures (1,000 pounds or more per square inch) shall be equipped with automatic or visible manual safety devices which will prevent pulling of the trigger to prevent release of the paint or fluid until the safety device is manually released.

In lieu of the above, a diffuser nut (which will prevent high pressure), high velocity release (while the nozzle tip is removed), plus a nozzle tip guard (which will prevent the tip from coming into contact with the operator), or other equivalent protection, shall be provided.

Powder Actuated Tools (Tools actuated by an explosive charge)

Only those employees who have been certified in their use shall operate these tools.

Explosive charges shall be carried and transported in approved containers.

Operators and assistants using these tools shall be protected by means of eye, face, and hearing protection.

Tools shall be maintained in good condition and serviced regularly by qualified persons. The material upon which these tools are to be used shall be examined before work is started to determine its suitability and to eliminate the possibility of hazards to the operator and others.

Prior to use, the operator shall ensure that the protective shield is properly attached to the tool.

Before using a tool, the operator shall inspect it to determine to his satisfaction that it is clean, that all moving parts operate freely, all guards and safety devices are in place, and that the barrel is free from obstructions.

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Before using tools the operator shall read and become familiar with the manufacturers operating guidelines and procedures.

When a tool develops a defect during use, the operator shall immediately cease to use it, until it is properly repaired in accordance with the manufactures specifications.

Tools shall not be loaded until just prior to the intended firing time, nor shall an unattended tool be left loaded. Empty tools are to be pointed at any workmen.

In case of a misfire, the operator shall hold the tool in the operating position for at least 30 seconds. He shall then try to operate the tool a second time. He shall wait another 30 seconds, holding the tool in the operating position; then he shall proceed to remove the explosive load in strict accordance with the manufacturer's instructions.

A tool shall never be left unattended in a place where it would be available to unauthorized persons.

Fasteners shall not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface hardened steel, glass block, live rock, face brick, or hollow tile.

Driving into materials easily penetrated shall be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.

Tools shall not be used in an explosive or flammable atmosphere.

Hydraulic Power Tools

The fluid used in hydraulic powered tools shall be fire-resistant fluids approved under Schedule 30 of the U.S. Bureau of Mines, Department of the Interior, and shall retain its operating characteristics at the most extreme temperatures to which it will be exposed.

The manufacturer's safe operating pressures for hoses, valves, pipes, filters, and other fittings shall not be exceeded.

All hydraulic tools, which are used on or around energized lines or equipment, shall use non-conducting hoses having adequate strength for the normal operating pressures.

Hydraulic Jacks

Loading and Marking

- The operator shall make sure that the jack used has a rating sufficient to lift and sustain the load.
- The rated load shall be legibly and permanently marked in a prominent location on the jack by casting, stamping, or other suitable means.

Operation and Maintenance

- In the absence of a firm foundation, the base of the jack shall be blocked. If there is a possibility of slippage of the cap, a block shall be placed in between the cap and the load.
- The operator shall watch the stop indicator, which shall be kept clean, in order to determine the limit of

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travel. The indicated limit shall not be overrun.

- After the load has been raised, it shall be cribbed, blocked, or otherwise secured at once.
- Hydraulic jacks exposed to freezing temperatures shall be supplied with adequate antifreeze liquid.
- All jacks shall be properly lubricated at regular intervals.

Each jack shall be thoroughly inspected before each use. Jacks, which are in unsafe condition, shall be tagged accordingly, and shall not be used until repairs are made.

Abrasive Blast Cleaning Nozzles

The blast cleaning nozzles shall be equipped with an operating valve, which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.

Fuel Powered Tools

All fuel-powered tools shall be stopped while being refueled, serviced, or maintained, and fuel shall be transported, handled, and stored in accordance with the Flammable and Combustible Liquids Program.

When fuel powered tools are used in enclosed spaces, the applicable requirements for concentrations of toxic gases and use of personal protective equipment, shall be adhered too.

Guarding Portable Tools

Guards shall be in place and operable at all times while the tool is in use. The guard may not be manipulated in such a way that will compromise its integrity or compromise the protection in which intended. Guarding shall meet the requirements set forth in ANSI B15.1.

Portable Circular Saws

- All portable, power-driven circular saws having a blade diameter greater than 2 in. shall be equipped with guards above and below the base plate or shoe.
- The upper guard shall cover the saw to the depth of the teeth, except for the minimum arc required to permit the base to be tilted for bevel cuts.
- The lower guard shall cover the saw to the depth of the teeth, except for the minimum arc required to allow proper retraction and contact with the work.
- When the tool is withdrawn from the work, the lower guard shall automatically and instantly return to covering position.
- All cracked saw blades shall be removed from service.

Switches and Controls

- All hand held powered tools, circular saws, drills, tappers, fastener drivers, horizontal or vertical angle grinders, etc., shall be with a constant pressure switch or control, and may have a lock-on control provided that turnoff can be accomplished by a single motion of the same finger or fingers that turn it on.
- All hand-held powered circular saws having a blade diameter greater than 2 inches, electric, hydraulic or pneumatic chain saws, and percussion tools without positive accessory holding means shall be equipped with a constant pressure switch or control that will shut off the power when the pressure is released. All hand-held gasoline powered chain saws shall be equipped with a constant pressure throttle control that will shut off the power to the saw chain when the pressure is released.
- The operating control on hand-held power tools shall be so located as to minimize the possibility of its

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accidental operation, if such accidental operation would constitute a hazard to employees.

- Grounding of portable electric powered tools shall meet the electrical requirements that can be found in the Electrical Safety Program. All electric power tools shall be equipped with a three-prong plug.

Portable Abrasive Wheels

Safety Guards Exceptions

- Wheels used for internal work while within the work being ground.
- Mounted wheels used in portable operations 2 inches and smaller in diameter.
- Types 16, 17, 18, 18R, and 19 cones, plugs, and threaded hole pot balls where the work offers protection.
- Guards shall be made of steel or other material with adequate strength.
- A safety guard shall cover the spindle end, nut and flange projections. The safety guard shall be mounted so as to maintain proper alignment with the wheel, and the strength of the fastenings shall exceed the strength of the guard.
- Exception: safety guards on all operations where the work provides a suitable measure of protection to the operator may be so constructed that the spindle end, nut and outer flange are exposed. Where the nature of the work is such as to entirely cover the side of the wheel, the side covers of the guard may be omitted.
- Exception: the spindle end, nut, and outer flange may be exposed on portable machines designed for, and used with, type 6, 11, 27, and 28 abrasive wheels, cutting off wheels, and tuck pointing wheels.

Mounting and Inspection of Abrasive Wheels

- Immediately before mounting, all wheels shall be closely inspected and a ring test performed, to make sure they have not been damaged in transit, storage, or otherwise.
- Ring test – “tap” wheels about 45 degrees each side of the vertical centerline and about 1 or 2 inches from the periphery; then rotate the wheel 45 degrees and repeat the test; a sound and undamaged wheel will give a clear metallic tone - If cracked, there will be a dead sound and not a clear “ring.”
- The spindle speed of the machine shall be checked before mounting of the wheel to be certain that it does not exceed the maximum operating speed marked on the wheel.
- Grinding wheels shall fit freely on the spindle and remain free under all grinding conditions.
- A controlled clearance between the wheel hole and the machine spindle (or wheel sleeves or adaptors) is essential to avoid excessive pressure from mounting and spindle expansion.
- The machine spindle shall be made to nominal (standard) size plus zero minus .002 inch, and the wheel hole shall be made suitably oversize to assure safety clearance under the conditions of operating heat and pressure.
- All contact surfaces of wheels, blotters, and flanges shall be flat and free of foreign matter.
- When a bushing is used in the wheel hole it shall not exceed the width of the wheel and shall not contact the flanges.

Portable Grinders

Special “revolving cup guards” which mount behind the wheel and turn with it shall be used. They shall be made of steel or other material with adequate strength and shall enclose the wheel sides upward from the back for one-third of the wheel thickness. It is necessary to maintain clearance between the wheel side and the guard. The clearance shall not exceed one-sixteenth inch.

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Vertical portable grinders, also known as right angle grinders, shall have a maximum exposure angle of 180 degrees and the guard shall be located between the operator and the wheel during use. Adjustment of the guard shall ensure that pieces of an accidentally broken wheel will be deflected away from the operator.

Other Portable Grinders

The maximum angular exposure of the grinding wheel periphery and sides for safety guards used on other portable grinding machines shall not exceed 180 degrees and the top half of the wheel shall be enclosed at all times.

Personal Protective Equipment

Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists, vapors or gases shall be provided with the particular PPE necessary to protect them from the hazard.

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Purpose

The purpose of this program is to ensure that the hazards of all chemicals and substances are evaluated and the information concerning their hazards is communicated to employees, including emergency response organizations, state and federal agencies, other employers and contractors, as necessary. This hazard information will be communicated, and displayed in accordance with this Hazard Communication Program.

NC Sturgeon is firmly committed to providing each of its employees a safe and healthy work environment. It is recognized that workers may use chemicals or substances that have potentially hazardous properties. When using these substances, workers must be aware of the identity, toxicity or hazardous properties of a chemical or substance, since an informed employee is more likely to be a safe employee. To this end, **NC Sturgeon** has established a written Hazard Communication Program.

Scope

This program is applicable to all **NC Sturgeon** employees who may be exposed to hazardous chemicals. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Chemical - any element, chemical compound, or mixture of elements and/or compounds.

Chemical Inventory List - a list of chemicals used at this facility, or by personnel that report to this facility.

Electronic Access – using electronic media (telephone, fax, internet, etc.) to obtain Material Safety Data Sheets or health information.

Facility - an establishment at one geographical location containing one or more work areas.

Hazardous chemical - any chemical that is a physical hazard, a health hazard, or has a Permissible Exposure Limit established for it.

Hazardous substance - see hazardous chemical.

Hazard Communication Program Coordinator - the person who has overall responsibility at a facility for that facility's Hazard Communication Program.

Health hazard - a substance for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic adverse health effects may occur in exposed employees.

IDLH - immediately dangerous to life and health.

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Immediate Use - the chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Jobsite - an area remote from a **NC Sturgeon** facility where hazardous chemicals are stored or used and employees are present for the purpose of **NC Sturgeon** business.

(MSDS) Material Safety Data Sheet - a written or printed document containing chemical hazard and safe handling information, prepared in accordance with the OSHA Occupational Safety & Health Standards, Section 1910.1200, paragraph (g).

(NFPA) National Fire Protection Association Labeling - a common industry labeling method developed by the National Fire Protection Association to identify the hazards associated with a particular chemical.

(PEL) Permissible Exposure Limit - the maximum eight-hour time weighted average of any airborne contaminant to which an employee may be exposed.

Readily available - when an employee has access during the course of his/her normal work shift.

Substance - see Chemical.

(TLV) Threshold Limit Value - the airborne concentration of a substance that represents conditions under which it is believed that nearly all normal workers may be repeatedly exposed day after day without adverse effect.

Work area - a room or defined space in a facility where hazardous chemicals are stored or used and where one or more employees are present.

Workplace - see Facility.

Workplace Chemical List - see Facility Chemical List.

Responsibilities

A written hazard communication program shall be developed, implemented and maintained at each **NC Sturgeon** workplace that describes how labels and other forms of warning, material safety data sheets and employee information will be met.

The Safety Manager is responsible for developing and implementing the Hazard Communications Program. Managers are responsible for maintaining Material Safety Data Sheets and the Chemical Inventory List for their locations. The Safety Manager reviews the MSDS files and Chemical Inventory List at each location at least annually to ensure that they are complete and up to date.

Employees are responsible for following the requirements in the Hazard Communication Program, to use proper personal protective equipment, to report containers without labels immediately and to not deface any label.

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Any employee who transfers any material from one container to another is responsible for labeling the new container with all required information.

All employees are responsible for learning the requirements of this section and for applying them to their daily work routine.

Requirements

Introduction

This Hazard Communication Program was prepared for use by **NC Sturgeon** to explain how **NC Sturgeon** meets the requirements of the federal Occupational Safety and Health Administration's Hazard Communication Standard (29 CFR 1910.1200). It spells out how **NC Sturgeon** will inventory chemicals stored and used, obtain and use material safety data sheets, maintain labels on chemical substances, and train employees about the hazards of chemicals they are likely to encounter on the job.

Preparation of this program indicates our continuing commitment to safety among our employees in all of our locations.

- Each facility is expected to follow this program and maintain its work areas in accordance with these requirements.
- Employees, their designated representatives, and government officials must be provided copies of this program upon request.
- In addition to the program, other information required as part of our hazard communication effort is available to workers upon request.
- Asking to see this information is an employee's right.
- Using this information is part of our shared commitment to a safe, healthy workplace.

List of Hazardous Chemicals

NC Sturgeon maintains a listing of all known hazardous chemicals known to be present or used at each job site by using the identity that is referenced on the appropriate material safety data sheet (MSDS). This identity is often a common name, such as the product or trade name (i.e., Lime-A-Way).

The Chemical Inventory List is updated as necessary and at least annually by the Hazard Communication Program Coordinator or their designee.

The facility Chemical Inventory List must be available for review upon request.

Material Safety Data Sheets

Chemical manufacturers are responsible for developing MSDSs. **NC Sturgeon** shall have a MSDS for each chemical used with the exception of consumer products. MSDSs must be obtained for each required chemical from the chemical manufacturer, supplier or vendor. The purchasing of any potentially hazardous chemical products from any supplier that does not provide an appropriate Material Safety Data Sheet in a timely fashion is prohibited.

MSDSs shall be maintained and readily accessible in each work area. MSDSs can be maintained at the primary work site. However, they should be available in case of an emergency. MSDSs must be made available, upon

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request, to employees, their designated representatives, the Assistant Secretary of Labor and the Director of OSHA.

Material Safety Data Sheets are filed alphabetically, by material classification, in the MSDS Book. A Chemical Inventory List is provided in the front of the MSDS Book, listing all MSDS' contained therein. This inventory serves as the index of the MSDS Book. The MSDS Book shall be displayed in a prominent location in the work area where it is accessible to all employees.

A copy of a MSDS request form is located in the first section of the MSDS Book. An employee may use a copy of this form to request an MSDS or he may ask the Manager for one. In either case the requested MSDS must be given to the employee within 24 hours.

The Material Safety Data Sheet must be kept in the MSDS library for as long as the chemical is used by the facility.

Electronic access (telephone, fax, internet, etc.) may be used to acquire and maintain MSDS libraries and archives.

The Manager is responsible for seeing that the Chemical Inventory List inventory is maintained, is current and is complete. He will review the inventory and the MSDS Book at least annually. When a hazardous material has been permanently removed from the work place, its MSDS is to be removed from the MSDS Book and the Chemical Inventory List. A file copy is to be maintained in a "dead file".

MSDS' for hazardous materials to which **NC Sturgeon** employees have been exposed must be maintained after the employee leaves the employment of **NC Sturgeon**.

Before any non-routine task is performed, employees will be advised of methods and special precautions, PPE and the hazards associated with chemicals and the hazards associated with chemicals contained in unlabeled pipes in their work areas. In the unlikely event that such tasks are required, the Manager will provide MSDS for involved chemical.

Employees have the right to request MSDS on any chemical and it must be provided without any issues.

Labels, Labeling and Warnings:

The Manager will ensure that all hazardous chemicals used or stored in the facility are properly labeled.

- Damaged labels or labels with incomplete information shall be reported immediately.
- Damaged labels on incoming containers of chemicals shall not be removed.
- New labels shall be provided as needed so that all containers are properly labeled.
- Only containers into which an employee transfers a chemical for their own immediate use will not require labeling.
- Employees who are unsure of the contents of any container, vessel or piping must contact their supervisor for information regarding the substance including:
 - The name of the substance
 - The hazards related to the substance
 - The safety precautions required for working with the substance.

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Labels, tags or markings on containers shall list as a minimum:

- Identity of hazardous chemical.
- Name and address of the chemical manufacturer, importer or other responsible party.
- Words, pictures, symbols or combinations thereof may be used.
- The trade name of the product as listed on the Material Safety Data Sheet.
- Appropriate hazard warnings to help employees protect themselves from the hazards of the substance.
- Labels shall be legible, in English. However, for non-English speaking employees, information shall be presented in their language as well.
- **NC Sturgeon** or employees shall not remove or deface labels on incoming containers of hazardous chemicals.

All containers must be labeled. When an employee transfers the contents of one container to another, he must label the new container with all required information. This information can be obtained from the labeling of the original container or from the material's MSDS. Any container of a potentially hazardous material that will not be emptied during one shift must be labeled, without exception.

Personnel in the Shipping and Receiving Departments are responsible for proper labeling of all containers shipped by **NC Sturgeon** and for the inspection of all incoming materials to ensure correct labeling. Chemicals received from vendors that are not properly labeled must be rejected.

NFPA Standard 704 labels shall be the preferred hazard identification method used in **NC Sturgeon** facilities and on materials containers used on client sites. All employees, clients, subcontractors and visitors who may come in contact with a **NC Sturgeon** hazardous substance must be briefed to ensure understanding of the NFPA 704 labeling system.

Training

Employees shall be provided with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new physical or health hazard the employees have not previously been trained about is introduced into their work area. Information and training may be designed to cover categories of hazards (e.g., flammability, carcinogenicity) or specific chemicals. Chemical-specific information must always be available through labels and material safety data sheets.

Additional training will be provided whenever a new chemical hazard is introduced into the work area. To reinforce the importance of handling chemicals properly when performing new or non-routine tasks supervisors will conduct supplementary training as needed.

Formal training will be conducted by facility employees or individuals who are knowledgeable in the Hazard Communication program.

The Manager shall ensure records of employee training are maintained.

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When an outside contractor, such as a pest control worker or a carpenter enters a **NC Sturgeon** site to perform a service for the company, he must first present MSDS' for any and all hazardous chemicals he will use. These MSDS' will be treated as above with the same training requirements. The Manager will be responsible for contacting each contractor before work is started to gather and disseminate any information concerning chemical hazards the contractor is bringing into the work place.

The Hazard Communication Program documented training shall, as a minimum, include:

- Requirements, details and rights of the employee as contained in the Hazard Communication regulation
- Operations and work areas where hazardous chemicals are present.
- Location of the written Hazard Communication Program, MSDSs and the Chemical Inventory List.
- How to access MSDS' or MSDS information.
- How to read and an explanation of labels and Material Safety Data Sheets for pertinent hazard information and how employees can obtain and use the appropriate hazard information.
- Methods and observations that may be used to detect the presence or release of hazardous chemicals by use of monitoring devices, visual appearance or odor.
- The physical & health hazards of chemicals in the work area.
- Protection measures to be utilized to prevent exposure.
- Appropriate work practices.
- Emergency procedures.
- Proper PPE to be used.

Multi-Employer Job Sites/Multi-Work Site

Multi-Work Sites

Where employees must travel between work places during a work shift, the written HAZCOM Program shall be kept at a primary job site. If there is no primary job site, then the program shall be sent with employees.

The program shall be made available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director in accordance with requirements of 29 CFR 1910.1020(e).

Multi-Employer Job Sites

A pre-job briefing shall be conducted with the contractor prior to the initiation of work on the site.

- During this pre-job briefing, contractors shall notify **NC Sturgeon** and present current copies of Material Safety Data Sheets and label information for every hazardous substance brought on-site.
- **NC Sturgeon** shall notify and provide required MSDS and label information for all hazardous materials the contractor may encounter on the job.
- The facilities labeling system and any precautionary measures to be taken by contractor during normal conditions and emergencies shall be addressed.
- By providing such information to other employers, **NC Sturgeon** does not assume any obligations that other employers have for the safety of their employees.

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- In this regard, other employers working on **NC Sturgeon** property or for **NC Sturgeon** on client's property remain fully responsible for developing and implementing their own compliant hazard communication programs.

Hazard Warnings / NFPA 704

The NFPA 704 Diamond is a means of disseminating hazard warning and information for a material. The diamond is divided into four sections. Each of the first three colored sections has a number in it associated with a particular hazard. The higher the number is, the more hazardous a material is for that characteristic. The fourth section includes special hazard information. The four sections and an explanation of the numbers in them are provided below:

					
RATING NUMBER	HEALTH HAZARD	FLAMMABILITY HAZARD	INSTABILITY HAZARD	RATING SYMBOL	SPECIAL HAZARD
4	Can be lethal	Will vaporize and readily burn at normal temperatures	May explode at normal temperatures and pressures	ALK	Alkaline
3	Can cause serious or permanent injury	Can be ignited under almost all ambient temperatures	May explode at high temperature or shock	ACID	Acidic
2	Can cause temporary incapacitation or residual injury	Must be heated or high ambient temperature to burn	Violent chemical change at high temperatures or pressures	COR	Corrosive
1	Can cause significant irritation	Must be preheated before ignition can occur	Normally stable. High temperatures make unstable	OX	Oxidizing
0	No hazard	Will not burn	Stable	Radioactive Symbol	Radioactive
				W	Reacts violently or explosively with water
				W OX	Reacts violently or explosively with water and oxidizing

WORKERS COMPENSATION EXPERIENCE RATING



Risk Name: N C STURGEON LP

Risk ID: 913152107

Rating Effective Date: 01/31/2017

Production Date: 09/15/2016

State: INTERSTATE

State	Wt	SRP	Exp Excess Losses	Expected Losses	Exp Prim Losses	Act Exc Losses	Ballast	Act Inc Losses	Act Prim Losses
NM	.13	0	68	90	22	0	40,775	0	0
TX	.15	0	89,371	147,424	58,053	0	38,000	0	0
(A) Wt	(B)	(C) Exp Excess Losses (D - E)	(D) Expected Losses	(E) Exp Prim Losses	(F) Act Exc Losses (H - I)	(G) Ballast	(H) Act Inc Losses	(I) Act Prim Losses	
.15		89,439	147,514	58,075	0	38,002	0	0	

	Primary Losses		Stabilizing Value		Ratable Excess		Totals		
Actual	(I) 0		C * (1 - A) + G 114,025		(A) * (F) 0		(J) 114,025		
Expected	(E) 58,075		C * (1 - A) + G 114,025		(A) * (C) 13,416		(K) 185,516		
	ARAP		FLARAP		SARAP		MAARAP		Exp Mod
Factors	1.00								(J) / (K) .61

REVISED RATING

THE ARAP FACTOR SHOWN IS FOR THOSE STATES CONTAINED ON THIS RATING THAT HAVE APPROVED THE ARAP PROGRAM AND IS CALCULATED BASED ON THE STATE WITH THE HIGHEST APPROVED MAXIMUM ARAP SURCHARGE. THE MAXIMUM ARAP SURCHARGE MAY VARY BY STATE. PLEASE REFER TO EACH STATE'S APPROVED RULES FOR THE APPLICABLE MAXIMUM ARAP SURCHARGE.
RATING REVISED TO REFLECT APPROVED RATING VALUES

Carrier: 22640 - 019 Policy: DTFUB4F43831216

Eff-Date: 01/31/2016 Exp-Date: 01/31/2017

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WORKERS COMPENSATION EXPERIENCE RATING



Risk Name: N C STURGEON LP

Risk ID: 913152107

Rating Effective Date: 01/31/2017

Production Date: 09/15/2016

State: INTERSTATE

30-NEW MEXICO

Firm ID: Firm Name: N C STURGEON LP

Carrier: 10863 Policy No. WC680565606 Eff Date: 10/01/2012 Exp Date: 10/01/2013

Code	ELR	D-Ratio	Payroll	Expected Losses	Exp Prim Losses	Claim Data	IJ	OF	Act Inc Losses	Act Prim Losses	
5221	1.99	.27	741	15	4						
5403	3.50	.23	1,810	63	14						
8810	.15	.36	8,240	12	4						
9812	ADDITIONAL PREMIUM			0	0						
9848	ADDITIONAL PREMIUM			0	0						
Policy Total:				10,791	Subject Premium:	462				Total Act Inc Losses:	0

30-NEW MEXICO

Firm ID: Firm Name: N C STURGEON LP

Carrier: 10863 Policy No. WC680565607 Eff Date: 10/01/2013 Exp Date: 10/01/2014

Code	ELR	D-Ratio	Payroll	Expected Losses	Exp Prim Losses	Claim Data	IJ	OF	Act Inc Losses	Act Prim Losses
9848	ADDITIONAL PREMIUM			0	0					
Policy Total:				0	Subject Premium: 120	Total Act Inc Losses:			0	

42-TEXAS

Firm ID: Firm Name: N C STURGEON LP

Carrier: 24600 Policy No. WC0002722501 Eff Date: 01/31/2013 Exp Date: 01/31/2014

Code	ELR	D-Ratio	Payroll	Expected Losses	Exp Prim Losses	Claim Data	IJ	OF	Act Inc Losses	Act Prim Losses
0042	1.67	.41	29,106	486	199					
5040	3.65	.38	40,641	1,483	564					
5102	1.71	.41	98,381	1,682	690					
5200	1.69	.41	1,197,187	20,232	8,295					
5403	2.07	.40	314,791	6,516	2,606					
5437	1.77	.41	14,043	249	102					
5538	2.92	.38	760,471	22,206	8,438					
5551	3.83	.38	63,362	2,427	922					
5606	.32	.40	287,670	921	368					
8809	.06	.35	62,400	37	13					
8810	.06	.39	300,482	180	70					
9014	1.04	.41	19,145	199	82					
Policy Total:				3,187,679	Subject Premium: 200,723	Total Act Inc Losses:			0	

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* Total by Policy Year of all cases \$2000 or less.

D Disease Loss

X Ex-Medical Coverage

U USL&HW

C Catastrophic Loss

E Employers Liability Loss

Limited Loss

WORKERS COMPENSATION EXPERIENCE RATING



Risk Name: N C STURGEON LP

Risk ID: 913152107

Rating Effective Date: 01/31/2017

Production Date: 09/15/2016

State: INTERSTATE

42-TEXAS

Firm ID:

Firm Name: N C STURGEON LP

Carrier: 29939

Policy No. 0001264065

Eff Date: 01/31/2014

Exp Date: 01/31/2015

Code	ELR	D-Ratio	Payroll	Expected Losses	Exp Prim Losses	Claim Data	IJ	OF	Act Inc Losses	Act Prim Losses
5200	1.69	.41	712,064	12,034	4,934					
5403	2.07	.40	256,240	5,304	2,122					
5538	2.92	.38	735,177	21,467	8,157					
5606	.32	.40	346,365	1,108	443					
8006	.93	.39	80,945	753	294					
8742	.09	.37	164,595	148	55					
8810	.06	.39	446,437	268	105					
9015	.94	.41	288,115	2,708	1,110					
Policy Total:			3,029,938	Subject Premium:	153,561	Total Act Inc Losses:			0	

42-TEXAS

Firm ID:

Firm Name: N C STURGEON LP

Carrier: 12637

Policy No. DTEUB4F43831215

Eff Date: 01/31/2015

Exp Date: 01/31/2016

Code	ELR	D-Ratio	Payroll	Expected Losses	Exp Prim Losses	Claim Data	IJ	OF	Act Inc Losses	Act Prim Losses
5040	3.65	.38	35,696	1,303	495					
5200	1.69	.41	634,675	10,726	4,398					
5403	2.07	.40	400,426	8,289	3,316					
5538	2.92	.38	734,379	21,444	8,149					
5606	.32	.40	261,796	838	335					
8006	.93	.39	51,303	477	186					
8742	.09	.37	107,500	97	36					
8810	.06	.39	504,311	303	118					
9015	.94	.41	376,486	3,539	1,451					
Policy Total:			3,106,572	Subject Premium:	136,008	Total Act Inc Losses:			0	

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* Total by Policy Year of all cases \$2000 or less.

D Disease Loss

X Ex-Medical Coverage

U USL&HW

C Catastrophic Loss

E Employers Liability Loss

Limited Loss

HOT WORK PERMIT

All temporary operations involving open flames or producing heat and/or sparks require a Hot Work Permit. This includes, but is not limited to, Brazing, Cutting, Grinding, Soldering, Thawing, and Welding.

INSTRUCTIONS FOR FIRE SAFETY SUPERVISOR

1. Verify precautions listed at right (or do not proceed with the work).
2. Complete page 1 and retain for job files.
3. Post page 2 in vicinity of hot work.

DATE	JOB NO.
------	---------

LOCATION/BUILDING & FLOOR (Be Specific)

DESCRIPTION OF WORK BEING PERFORMED

NAME OF PERSON DOING HOT WORK

The above location has been examined, the precautions checked on the Hot Work Checklist have been taken to prevent fire, and permission is authorized for this work.

SIGNED: _____
(Permit Authorizing Individual)

SIGNED: _____
(Person doing Hot Work)

SIGNED: _____
(Fire Watch)

TIME
STARTED: Date: _____ Time: _____ AM/PM

Date: _____ Time: _____ AM/PM

FIRE WATCH SNOFF

Work area and all adjacent areas to which sparks and heat might have spread were inspected during the fire watch period and were found fire safe.

Signed: _____

FINAL CHECKUP (minimum 30 minutes after Hot Work)

Work area was monitored for _____ hour(s) following Hot Work and found fire safe.

Signed: _____

FILL OUT EMERGENCY INFORMATION ON BACK OF Page 2.

HOT WORK CHECKLIST Sprinklers

- ☐ and hose streams in service/operable. Hot Work
- ☐ Equipment in good condition (e.g., power source, welding leads, torches, etc.)
- ☐ Multi-purpose fire extinguisher and/or water pump can.

REQUIREMENTS WITHIN 35 FEET OF WORK

- ☐ Dust, Lint, Debris, Flammable Liquids and oily deposits removed; floors swept clean.
- ☐ Explosive atmosphere in area eliminated.
- ☐ Combustible floors (e.g., wood, tile, carpeting) wet down, covered with damp sand or fire blankets.
- ☐ Remove flammable and combustible material where possible. Otherwise protect with fire blankets, guards, or metal shields.
- ☐ All wall and floor openings covered.
- ☐ Walkways protected beneath hot work.

WORK ON WALLS OR CEILINGS

- ☐ Combustibles moved away from other side of wall.

WORK IN CONFINED SPACES

- ☐ Confined space cleaned of all combustibles (example: grease, oil, flammable vapors).
- ☐ Containers purged of flammable liquids/vapors.
- ☐ Follow confined space guidelines.

FIRE WATCH/HOT WORK AREA MONITORING

- ☐ Fire watch will be provided during and for 30 minutes after work, including any coffee or lunch breaks.
- ☐ Fire watch is supplied with an extinguisher, and/or water pump can, also making use of other extinguishers located throughout work area.
- ☐ Fire watch is trained in use of this equipment and familiar with location of sounding alarm.
- ☐ Fire watch may be required for opposite side of walls, above, and below floors and ceilings.

OTHER PRECAUTIONS TAKEN

☐

WARNING!
HOT WORK IN PROGRESS
WATCH FOR FIRE!

IN CASE OF AN EMERGENCY:

CALL: _____

AT:

WARNING!

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Purpose

The purpose of this program is to define the requirements for recording job related injuries and illnesses for **NC Sturgeon**.

Scope

This policy shall cover all **NC Sturgeon** operations within the United States. Specific guidelines are available at the following website link: <http://www.osha.gov/recordkeeping/index.html>.

Key Responsibilities

Safety Manager

- Shall ensure all job related injuries and illness are recorded properly in accordance with OSHA requirements.
- Shall ensure all required posting are conducted in accordance with recordkeeping guidelines
- Shall maintain all required records.
- Shall determine the proper classification of job related injuries or illnesses based on OSHA recordkeeping guidelines.

Supervisors

- Shall ensure that all job related injuries and illness are reported promptly to the **NC Sturgeon** Safety Manager.

Employees

- Shall promptly report any actual or suspected job related injury or illness.

Procedure

If **NC Sturgeon** is required to keep records of fatalities, injuries, and illnesses it must record each fatality, injury and illness that:

- work-related; and
- is a new case; and
- meets one or more of the general recording criteria.

NC Sturgeon must enter each recordable injury or illness on an OSHA 300 Log and 301 Incident Report, or other equivalent form, within seven (7) calendar days of receiving information that a recordable injury or illness has occurred.

A **NC Sturgeon** executive must certify that he or she has examined the OSHA 300 Log and that he or she reasonably believes, based on his or her knowledge of the process by which the information was recorded, that the annual summary is correct and complete.

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Posting

NC Sturgeon must post a copy of the annual summary in each establishment in a conspicuous place or places where notices to employees are customarily posted. **NC Sturgeon** must ensure that the posted annual summary is not altered, defaced or covered by other material.

The annual summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.

NC Sturgeon must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover.

See next page for current OSHA recordkeeping forms as of this date.

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	ASBESTOS AWARENESS			Revision No.	0
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Purpose

The purpose of this procedure is to advise employees in areas where asbestos is suspected on an awareness level basis about the properties and dangers of asbestos, general guidelines and training requirements and to provide basic precautions and protections for employees to avoid exposure to asbestos containing material (ACM) or presumed asbestos containing material (PACM).

Scope

This procedure applies to NC Sturgeon operations where employees whose work activities may be in the vicinity of asbestos containing materials during their work activities. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers NC Sturgeon employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

Managers/Supervisors

- Ensure owners or operators are notified of PACM.
- Prohibit NC Sturgeon employees from working until material in question is confirmed as non-asbestos or abated.
- Ensure proper employee asbestos awareness training is completed.

All Employees

- All employees are required to act in strict compliance with the requirements of this program and delay or discontinue work if there is ever an unresolved concern regarding exposure to asbestos.
- Immediately report any suspected asbestos containing material to their supervisor

Awareness Level Requirements and Information

Asbestos Exposure Control

Depending on the exposure level NC Sturgeon is required to develop and train workers on an Asbestos Exposure Controls Plan.

Background of Asbestos

The word asbestos is derived from a Greek word that means inextinguishable or indestructible. Asbestos is a naturally occurring mineral that is found throughout the world. Asbestos has several characteristics that make it desirable for many commercial uses. The fibres are extremely strong, flexible, and very resistant to heat, chemicals and corrosion. Asbestos is also an excellent insulator and the fibres can be spun, woven, bonded into other materials, or pressed to form paper products. For these reasons and because it is relatively inexpensive asbestos has been widely used for many years and now is found in over three thousand different commercial products.

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Exposure to asbestos fibres can cause serious health risks. The major risks from asbestos come from inhaling the fibres. Asbestos is composed of long silky fibres that contain hundreds of thousands of smaller fibres. These fibres can be subdivided further into microscopic filaments that will float in the air for several hours. Asbestos fibres can easily penetrate body tissues and cause disabling and fatal diseases after prolonged exposure.

Although exposure to asbestos is potentially hazardous, health risks can be minimized. In most cases the fibres are released only if the asbestos containing materials (ACM) is disturbed. Intact and undisturbed asbestos materials do not pose a health risk. The mere presence of asbestos does not mean that the health of occupants is endangered. When ACM is properly managed, release of fibres into the air is prevented or minimized, and the risk of asbestos related disease can be reduced to a negligible level. However, asbestos materials can become hazardous when they release fibres into the air due to damage, disturbance, or deterioration over time.

The ability to recognize the kinds of material that contain asbestos, knowing under what conditions they are dangerous, and understanding basic safety precautions, are all important in keeping exposures to a minimum.

Health Effects of Asbestos

The most dangerous exposure to asbestos is from inhaling airborne fibres. The body's defenses can trap and expel many of the particles. However, as the level of asbestos fibres increase many fibres bypass these defenses and become embedded in the lungs. The fibres are not broken down by the body and can remain in body tissue indefinitely. Exposure to asbestos has been shown to cause respiratory diseases such as lung cancer, asbestosis, mesothelioma and various types of cancer of the stomach and colon.

Possible Locations Where Employees May Be Exposed to Asbestos During Their Job Functions

Asbestos materials are used in the manufacture of heat-resistant clothing, automotive brake and clutch linings, and a variety of building materials including insulation, soundproofing, floor tiles, roofing felts, ceiling tiles, asbestos-cement pipe and sheet and fire-resistant drywall. Asbestos is also present in pipe and boiler insulation materials, pipeline wrap and in sprayed-on materials located on beams, in crawlspaces, and between walls.

Client owned and/or operated equipment and facilities, where surfacing material or insulation is present, must be confirmed non-asbestos before NC Sturgeon employees disturb that material. Where surfacing material or insulation cannot be confirmed non-asbestos, the client or owner must test, and where necessary abate, the material before NC Sturgeon employees are permitted to work.

Types of Asbestos

Asbestos can be defined as friable or non-friable. Friable means that the material can be crumbled with hand pressure and is therefore likely to emit fibres. The fibrous or fluffy sprayed-on materials used for fireproofing, insulation, or sound proofing are considered to be friable and they readily release airborne fibres if disturbed.

Materials such as vinyl-asbestos floor tile or roofing felts are considered non-friable and generally do not emit airborne fibres unless subjected to sanding or sawing operations. Asbestos cement pipe or sheet can emit airborne fibres if the materials are cut, abraded or sawed, or if they are broken during demolition operations.

Identifying Asbestos

There are many substances that workers contact that may contain asbestos and have the potential to release fibres. Only rarely can asbestos in a product be determined from labeling or by consulting the manufacture. The

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presence of asbestos cannot be confirmed visually in many cases. The only way to positively identify asbestos is through laboratory analysis of samples. If the presence of asbestos is suspected always assume that it is an asbestos containing material and have it analyzed.

Employees will abide warning signs and labels and will not disturb the asbestos containing material.

Signs and labels shall identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that Asbestos Containing Material (ACM) and/or Presumed Asbestos Containing Material (PACM) will not be disturbed. NC Sturgeon shall ensure that employees working in and adjacent to regulated areas comprehend the warning signs.

General Safety Precautions

The following general precautions will reduce exposure and lower the risk of asbestos related health problems:

- Drilling, sawing, or using nails on asbestos materials can release asbestos fibres and should be avoided.
- Floor tiles, ceiling tiles or adhesives that contain asbestos should never be sanded.
- Use care not to damage asbestos when moving furniture, ladders, or any other object.
- Know where asbestos is located in your work area. Use common sense when working around products that contain asbestos. Avoid touching or disturbing asbestos materials on walls, ceilings, pipes, ducts or boilers.
- All asbestos containing materials should be checked periodically for damage or deterioration. Report any damage, change in condition or loose asbestos containing material to a supervisor.
- All removal or repair work involving asbestos must be done by specially trained personnel.
- Asbestos should always be handled wet to help prevent fibres from being released. If asbestos is soaked with water or a mixture of water and liquid detergent before it is handled, the fibres are too heavy to remain suspended in the air.
- In the presence of asbestos dust above the PEL, the use of a respirator approved for asbestos work is required. A dust mask is not acceptable because asbestos fibres will pass through it.
- Dusting, sweeping, or vacuuming dry asbestos with a standard vacuum cleaner will put the fibres back into the air. A vacuum cleaner with a special high efficiency filter (HEPA) must be used to vacuum asbestos dust.
- If a HEPA vacuum is not used clean-ups must be done with a wet cloth or mop. The only exception to this would be if the moisture presents an additional hazard such as around electricity.

Remember, the mere presence of asbestos itself does not create a health hazard unless the material is disturbed and releases fibres to the atmosphere. Protect yourself and others by being aware of where asbestos is located, the dangers involved and using common sense when working around ACM.

Multiple Worksites

NC Sturgeon does not want our employees exposed by asbestos work being performed by other companies. When working on multi-contractor worksites NC Sturgeon employees shall be protected from exposure. If employees working adjacent to Class I asbestos jobs are exposed to asbestos due to the inadequate containment of such jobs NC Sturgeon shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

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Personnel Air Monitoring

Depending on the exposure level NC Sturgeon is required to perform air sampling.

Medical Surveillance Program

All NC Sturgeon employees who are exposed to asbestos at the regulated level shall be included in the NC Sturgeon medical surveillance program.

Respiratory Protection

The only circumstances that will necessitate NC Sturgeon employees using respiratory equipment for protection against asbestos is during the asbestos exposure assessment process, while confirming (via personnel monitoring) that the engineering controls and work practices designed and employed for a particular work activity are adequate to maintain exposure levels below the PEL/excursion limit. Asbestos work that requires respiratory equipment beyond the PEL should be performed by a qualified contractor.

Waste Disposal

Asbestos waste, scrap, debris, bags, containers, equipment, and contaminated clothing shall be collected and disposed of in sealed, labeled impermeable bags of greater than 6 mils thickness or other closed, labeled, impermeable containers.

Training

Asbestos awareness training is required for employees who work in areas that contain or may contain asbestos and NC Sturgeon shall ensure the training is documented.

Asbestos awareness training is required for employees whose work activities may contact Asbestos Containing Material (ACM) or Presumed Asbestos Containing Material (PACM) but do not disturb the ACM or PACM during their work activities.

Subcontractors performing work shall comply with the requirements of this standard and all applicable regulatory and environmental regulatory requirements.

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Purpose

The purpose of this program is to provide procedures and guidelines to eliminate all injuries resulting from possible malfunctions, improper grounding and/or defective electrical tools. This program applies to all sites, employees and contractors and shall be used on owned premises.

Definitions

Competent Person - 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.

Ground Fault Circuit Interrupter - a device for the protection of personnel that functions to de-energize a circuit or portion thereof within an established period of time when a current to ground exceeds some predetermined value that is less than that required to operate the overcurrent protective device of the supply circuit.

Responsibilities

Supervisors are designated as competent persons for the Assured Equipment Grounding Conductor Program and are responsible for implementation. One or more competent persons must be designated (as defined in 1926.32(f) to implement the program (see definitions).

Employees are responsible for following the requirements of this program, to perform visual inspections and to take defective equipment out of service.

Procedure

Assured Grounding

OSHA requires that employers shall use either ground fault circuit interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

- NC Sturgeon shall use GFCI's in lieu of an assured grounding program.

Ground Fault Circuit Interrupters

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords shall use a GFCI.
- Additionally, approved GFCI's shall be used for 240-Volt circuits in the same service as described above.
- GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

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Assured Equipment Grounding Conductor Program

The Assured Equipment Grounding Conductor Program (AEGCP) shall cover all cord sets, receptacles not a part of the permanent wiring of a structure and equipment connected by cord and plug on all construction and maintenance sites.

This written description of the program shall be kept at the jobsite for inspection and copying by OSHA and any affected employee.

Removing Equipment:

- Any equipment which has not met the requirements of this program shall not be available or permitted to be used. Damaged items shall not be used until repaired.

Daily Visual inspections – The following shall be visually inspected before each day's use for external defects (such as deformed or missing pins or insulation damage) and for indication of possible internal damage:

- Cord sets;
- Attachment caps;
- Plug and receptacle of cord sets;
- Any equipment connected by cord and plug (with the exception of cord sets and receptacles which are fixed and not exposed to damage) such as deformed or missing plug, and
- Insulation damage
- Damaged items shall not be used until repaired or discarded.

Continuity Testing – Testing must ensure continuity and electrically continuous. The tester shall use either a continuity tester or an ohmmeter for testing equipment grounding conductors on the following:

- All cord sets;
- Receptacles that are not a part of the permanent wiring of the building or structure; and
- All plug-connected equipment required to be grounded.

Grounding Conductor Testing – The tester shall use either a continuity tester or an ohmmeter for testing. Each receptacle and plug of the following shall be tested for correct attachment of the equipment grounding conductor and the equipment grounding conductor shall be connected to its proper terminal:

- All cord sets;
- Receptacles that are not a part of the permanent wiring of the building or structure; and
- All plug-connected equipment required to be grounded.

Test Frequency – All required tests shall be performed with the following frequency:

- Before first use;
- Before equipment is returned to service following any repairs;

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- Before equipment is used after any incident that can be reasonably suspected to have caused damage; and
- At intervals not to exceed 3 months, except that cord sets and receptacles that are fixed and not exposed to damage shall be tested at intervals not to exceed six months.

All tests shall be documented to identify each receptacle, cord set and cord and plug-connected equipment that passed the test, the date of the test and the individual responsible for the test. Records shall be made available at each job site for inspection by employees and OSHA.

All tested cord sets and cord and plug-connected equipment shall be marked, one or both ends, with colored tape to denote the month that the tests were performed. The below color code chart that must be followed for marking.

Month #	Month	Color of Tape to Apply to Cords
1	Jan	Red
2	Feb	Yellow
3	Mar	Green
4	Apr	Blue
5	May	Brown
6	Jun	White
7	Jul	Start over with Red and repeat

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Purpose

This Bloodborne Pathogen Exposure Control Plan has been established to ensure a safe and healthful working environment and act as a performance standard for all employees. This program applies to all occupational exposure to blood or other potentially infectious materials. The content of this plan complies with OSHA Standard 29 CFR 1910.1030 (Occupational Exposure to Bloodborne Pathogens).

Scope

This program addresses all occupational exposure to blood or other potentially infectious materials. OSHA requires that all employers that can "reasonably anticipate exposure" of employees to infectious material to prepare and implement a written exposure control plan.

Key Responsibilities

Exposure Control Officer (NC Sturgeon Safety Manager)

Has overall responsibility for developing and implementing the Exposure Control Procedure for all facilities.

Site Project Manager and Supervisors

Site project manager and supervisors are responsible for exposure control in their respective areas.

Employees

- Know what tasks they perform that have occupational exposure.
- Plan and conduct all operations in accordance with our work practice controls.
- Develop good personal hygiene habits.

Procedure

Training

NC Sturgeon shall ensure that all employees with occupational exposure participate in a training program. Training is conducted for all employees with occupational exposure before initial assignment and within 1 year of previous training. Training shall be provided at the time of initial assignment & within 1 year of an employee's previous training. Training shall include:

- What bloodborne pathogens are; how to protect themselves from exposure
- Methods of warnings (signs, labels, etc.)
- The OSHA requirements of bloodborne pathogens
- The Hepatitis B vaccine shall be made available to all employees that have occupational exposure at no cost to the employee(s).



Biohazard Label

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Availability of Procedure to Employees

All employees will have access to a copy of the exposure control plan. Access to a copy of the exposure control plan shall be provided in a reasonable time, place, and manner.

Reviews and Update of the Procedure

The procedure is reviewed annually and updated whenever we establish new functional positions within our facility that may involve exposure to biohazards.

Exposure Determination

- There are no job classifications in which some or all employees have occupational exposure to bloodborne pathogens that may result from the performance of their routine duties.
- Designated employees are trained to render first aid and basic life support. Rendering first aid or basic life support will expose employees to bloodborne pathogens and will require them to adhere to this program.
- In addition, no medical sharps or similar equipment is provided to, or used by, employees rendering first aid or basic life support.
- This exposure determination has been made without regards to the Personal Protective Equipment that may be used by employees.
- A listing of all first aid and basic life support trained employees in this work group shall be maintained at each work site and at each first aid kit.

Methods of Compliance

Universal Precautions

Under circumstances in which differential between body fluids is difficult or impossible, all body fluids will be considered potentially infectious.

Engineering Controls

Engineering and work practice controls shall be used to eliminate or minimize employee exposure. Engineering controls should be examined and maintained or replaced on a regular schedule to ensure their effectiveness. Hand washing facilities shall be readily available at all work locations. If provision of hand washing facilities is not feasible, then an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes shall be provided by NC Sturgeon.

Containers for contaminated reusable sharps that our clients provide have the following characteristics: Puncture-resistant; Color-coded or labelled with a biohazard warning label; Leak-proof on the sides and bottom.

Secondary containers which are: Leak-proof; Color-coded or labelled with a biohazard warning label; Puncture-resistant, if necessary.

Work Practice Controls

- Employees shall wash their hands immediately, or as soon as feasible, after removal of potentially contaminated gloves or other personal protective equipment.

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- Following any contact of body areas with blood or any other infectious materials, employees wash their hands and any other exposed skin with soap and water as soon as possible.
- Hand washing facilities shall be available. If hand washing facilities are not feasible NC Sturgeon will provide either an appropriate antiseptic hand cleanser in conjunction with cloth/paper towels or antiseptic towelettes.
- Contaminated needles and other contaminated sharps should not be handled if you are not AUTHORIZED or TRAINED to do so. Contaminated needles and other contaminated sharps are not bent or recapped.
- Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas where there is potential for exposure to bio-hazardous materials.
- Food and drink is not kept in refrigerators, freezers, on countertops or in other storage areas where potentially infectious materials are present.
- All equipment or environmental surfaces shall be cleaned and decontaminated after contact with blood or other infectious materials.
- Specimens of blood or other potentially infectious materials must be put in leak proof bags for handling, storage and transport.
- If outside contamination of a primary specimen container occurs, that container is placed within a second leak proof container, appropriately labelled, for handling and storage.
- Bloodborne pathogens kits are located on top of first aid kits and are to be used in emergency situations by the caregiver. Once the seal is broken on kit and any portion has been used it is not to be reused. Pathogen Kits shall be ordered and replaced promptly. Biohazard bags are identified by stickers and located in the first aid area. Contaminated supplies are to be disposed at once.

Personal Protective Equipment

When the possibility of occupational exposure is present, PPE is to be provided at no cost to the employee such as gloves, gowns, etc. PPE shall be used unless employees temporarily declined to use under rare circumstances. PPE shall be repaired and replaced as needed to maintain its effectiveness. All PPE shall be of the proper size and readily accessible.

Our employees adhere to the following practices when using their personal protective equipment:

- Any garments penetrated by blood or other infectious materials are removed immediately.
- All potentially contaminated personal protective equipment is removed prior to leaving a work area.
- Gloves are worn whenever employees anticipate hand contact with potentially infectious materials or when handling or touching contaminated items or surfaces.
- Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an "exposure barrier".
- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
- Any PPE exposed to bloodborne pathogens shall be disposed of properly.
- PPE shall be used unless employees temporarily declined to use PPE under rare circumstances.
- PPE should be cleaned, laundered & properly disposed of if contaminated.

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- NC Sturgeon will repair and replace PPE as needed to maintain its effectiveness.

Housekeeping

Our staff employs the following practices:

- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious materials.
- Protective coverings (such as plastic trash bags or wrap, aluminum foil or absorbent paper) are removed and replaced.
- All trash containers, pails, bins, and other receptacles intended for use routinely are inspected, cleaned and decontaminated as soon as possible if visibly contaminated.
- Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.).

Post-Exposure and Follow Up

Post-Exposure Evaluation & Follow-Up

If there is an incident where exposure to bloodborne pathogens occurred we immediately focus our efforts on investigating the circumstances surrounding the exposure incident and making sure that our employees receive medical consultation and immediate treatment.

The NC Sturgeon Safety Manager/ Supervisor investigates every reported exposure incident and a written summary of the incident and its causes is prepared and recommendations are made for avoiding similar incidents in the future. We provide an exposed employee with the following confidential information:

- Documentation regarding the routes of exposure and circumstances under which the exposure incident occurred.
- Identification of the source individual (unless not feasible or prohibited by law).

Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified healthcare professional to discuss the employee's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

Information Provided to the Healthcare Professional. We forward the following:

- A copy of the Biohazards Standard.
- A description of the exposure incident.
- Other pertinent information.

Healthcare Professional's Written Opinion

After the consultation, the healthcare professional provides our facility with a written opinion evaluating the exposed employee's situation. We, in turn, furnish a copy of this opinion to the exposed employee. The written opinion will contain only the following information:

- Whether Hepatitis B Vaccination is indicated for the employee.

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- Whether the employee has received the Hepatitis B Vaccination.
- Confirmation that the employee has been informed of the results of the evaluation.
- Confirmation that the employee has been told about any medical conditions resulting from the exposure incident which require further evaluation or treatment.
- All other findings or diagnoses will remain confidential and will not be included in the written report.

Record Keeping

All records shall be made available upon request of employees, OSHA's Assistant Secretary and the Director of OSHA for examination and copying. Medical records must have written consent of employee before released. NC Sturgeon shall meet the requirements involving transfer of records set forth in 29 CFR 1910.1020(h).

The respective Human Resources representative shall maintain Bloodborne Pathogen exposure records.

Employee medical records shall be kept confidential and are not to be disclosed without the employee's written consent, except as required by 29 CFR 1910.1030 or other law.

Accurate medical records for each employee with occupational exposure must be maintained for at least the duration of employment plus 30 years and shall include at least the following:

- Employee's name, Social Security number and NC Sturgeon employee number.
- Employee's Hepatitis B vaccination status, including vaccination dates.
- All results from examinations, medical testing and follow-up procedures, including all health care professional's written opinions.
- Information provided to the health care professional.
- Any Hepatitis B Vaccine Declinations.

Training records shall be maintained for 3 years from the date on which the training occurred and shall include at least the following:

- Outline of training program contents.
- Name of person conducting the training.
- Names and job titles of all persons attending the training.
- Date of training.

Labels and Signs

Biohazard warning labelling shall be used on containers of regulated waste; Sharps disposal containers; contaminated laundry bags and containers; contaminated equipment.

Information

Information provided to our employees includes:

- The Biohazards Standard itself.
- The epidemiology and symptoms of bloodborne diseases.

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- The modes of transmission of bloodborne pathogens.
- Our facility's Exposure Control Procedure (and where employees can obtain a copy).
- Appropriate methods for recognizing tasks and other activities that may involve exposure.
- A review of the use and limitations of methods that will prevent or reduce exposure.
- Selection and use of personal protective equipment.
- Visual warnings of biohazards within our facility including labels, signs and "color-coded" containers.
- Information on the Hepatitis B Vaccine.
- Actions to take and persons to contact in an emergency involving potentially infectious material.
- The procedure to follow if an exposure incident occurs, including incident reporting.
- Information on the post-exposure evaluation and follow-up, including medical consultation.

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VACCINATION DECLINATION FORM

Date: _____

Employee Name: _____

Employee ID#: _____

I understand that due to my occupational exposure to blood or other potential infectious materials I may be at risk of acquiring Hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However, I decline the Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If, in the future, I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee Signature

Date

Facility Representative Signature

Date

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POST-EXPOSURE EVALUATION AND FOLLOW-UP CHECKLIST

The following steps must be taken, and information transmitted, in the case of an employee's exposure to bloodborne pathogens:

ACTIVITY

COMPLETION DATE

Employee furnished with documentation regarding exposure incident.

Source individual identified.

(_____) Source individual

Appointment arranged for employee with healthcare professional.

(_____) Professional's name

Documentation forwarded to healthcare professional

Bloodborne Pathogens Standard

Description of exposed employee's duties

Description of exposure incident, including routes of exposure

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Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of **NC Sturgeon** vehicle safety.

Key Responsibilities

NC Sturgeon Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the program and related procedures. These procedures are kept in the designated safety manager's office.

Site Manager

- Responsible for the implementation and maintenance of the program for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local workplace vehicle safety program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.

Vehicle and Transportation Related

Driving Safety

Operators of **NC Sturgeon** or client on or off road vehicles shall be qualified by possession of a valid, current driver's license for the type of vehicle being driven.

Only authorized employees will drive a motor vehicle in the course and scope of work or operate a company owned vehicle.

Drivers shall have 3 years of driving experience on the vehicle he/she is licensed to drive & regularly drives.

Drivers will be appropriately assessed, licensed and trained to operate the vehicle they have been authorized to operate.

No passengers shall be on trucks used to deliver goods.

Backing is prohibited whenever practicable. Where backing is required, drivers, when parking, should make every effort to park the vehicle in a manner that allows the first move when leaving the parking space to be forward.

Drivers must have either a reversing alarm, use a spotter or walk around the truck/trailer prior to backing.

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Passenger compartments are to be free from loose objects that might endanger passengers in the event of an incident. Any vehicle with non-segregated storage shall be equipped with a cargo net or equivalent to separate the storage area.

Vehicles (light vehicles, heavy vehicles and trailers) may not be modified without the endorsement of the manufacturer.

Signs, stickers or labels are to be fitted in such a manner that they do not obstruct the driver's vision or impede the driver's use of any controls.

Employees driving vehicles are required to follow safe driving practices:

- Obey all federal and local driving laws or regulations as well as requirements of clients;
- Immediately report any citation, warning, traffic violation, collision, vehicle damage or near miss associated with company or client vehicle operation or while driving on company duties to the supervisor;
- Immediately report any restriction or change to their driving privileges to the supervisor.
- Seat belts shall always be worn by all occupants whenever the vehicle is in motion; only seats fitted with three-point inertia-reel type seatbelts shall be used. All vehicles capable of more than 10 mph/15 kph shall have seat belts installed.
- Defensive drivers continually assess conditions and hazards and remain prepared for any challenge that may approach them;
- When speaking with a passenger, always keep your eyes on the road;
- Both hands on the wheel;
- No use of cell phones, radios or other electronic devices while driving any vehicle - vehicle must be safely parked prior to using a mobile phone or 2-way radio.
- Slow down around construction, large vehicles, wildlife, fog, rain, snow, or anything else that adds a hazard to your driving;
- Drive for conditions, not just the speed limit;
- Alcohol or illegal drugs are not allowed to be in a company, client or leased vehicle at any time;
- Drivers shall not operate a motor vehicle while under the influence of alcohol, illegal drugs, or prescription or over-the counter medications that might impair their driving skills.

Drivers are to be prepared before leaving:

- Perform 360 walk around – report new damage;
- Check windshield for cracks that could interfere with vision;
- Inspect for vehicle damage and immediately report any damage to the supervisor if not previously observed;
- Make sure dirt or snow is removed from lights on all sides of the vehicle;
- Brush or clean off snow or ice on all windows to ensure complete vision;
- Check fuel level to be certain the destination can be reached;
- Check to ensure the license plates and inspection tag on vehicle are current;
- Ensure that there is a first aid kit and inspected fire extinguisher in the company vehicle;
- Ensure driver is rested and alert for driving;
- Employees are not to perform repairs or maintenance other than routine fluid additions.

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Vehicle Requirements

- All vehicles shall be fit for the purpose, and shall be maintained in safe working order.
- No vehicle less than 1000 kg is to be used on public roads.
- Tires, including spares if full size, are to be of same type, profile and tread pattern, except when the vehicle or tire Manufacturer recommends a different type for certain axles.
- Tire type and pattern is to be recommended by the vehicle or tire manufacturer for use on the vehicle in the area of operation.
- Vehicles are to be fitted with a spare wheel and changing equipment to safely change a wheel, or a suitable alternative.
- Vehicles longer than 6 meters/20 feet or with restricted rear view (i.e. pickup trucks that are fully loaded) are to be fitted with an audible reversing alarm.
- All seats are to be fitted with headrests
- All light duty vehicles (including buses) are to be equipped with an adjustable left, right and central rear view mirrors
- Loads shall be secure and shall not exceed the manufacturer's specifications and legal limits for the vehicle.
- All vehicles are to be equipped with a multipurpose fire extinguisher with a capacity of at least 0.9 kg/2 lb. The fire extinguisher shall be securely mounted on a bracket and located so that it is easily accessible in an emergency without becoming a hazard in case of an incident.
- All light vehicles shall be equipped with a securely stowed first aid kit.
- All drivers of light vehicles shall carry a high visibility jacket for use in case of emergency stops.
- All light duty vehicles carry a minimum of one collapsible hazard warning triangle.
- Rollover protection will be installed in any vehicle to address high risk environments. The rollover protection engineered will conform to recognized regulatory standard and industry preferred practices.
- All light equipment vehicles shall be outfitted with two red high-intensity lights located as high, as far apart, and as far back as practical, wired to the headlight switch, but also with an override switch, if permitted by local regulations.

Transportation

If workers are required to travel in a worker transportation vehicle **NC Sturgeon** must ensure that reasonable measures are taken to evaluate road, weather and traffic conditions to ensure the safe transit of the workers.

The operator of a worker transportation vehicle must ensure that the worker transportation vehicle has been inspected by a qualified person before first use on a work shift.

Seated workers must wear seat belts while being transported in a vehicle equipped with seat belts.

A worker must not ride in a vehicle in a standing position, unless protected from being thrown off balance.

A worker must not ride in a vehicle with any part of the body outside the vehicle unless essential to the work process and then only if the worker is adequately restrained.

Materials, goods, tools or equipment carried in a portion or compartment of a vehicle in which workers are riding must be located and secured to prevent injury to the operator or workers.

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Any enclosed portion or compartment of a vehicle in which workers are transported must have:

- effective ventilation, independent of doors, providing clean air,
- adequate lighting and means for heating and cooling,
- an effective means of communication between the operator and passengers, and
- more than one means of exit.

Traffic Control

NC Sturgeon shall develop, in writing, and implement a traffic protection plan for its workers at a worksite if any of them may be exposed to a hazard from vehicular or pedestrian traffic that may endanger the safety of any worker. It shall include the following control measures:

- Effective means of traffic control shall be provided whenever the unregulated movement of vehicular traffic constitutes a hazard to workers.
- Traffic control shall include barricades and cones as the primary control and, where required, signs, flagmen or other techniques and devices made necessary by the prevailing circumstances.
- Operations or equipment, encroaching on the traveled way, shall be protected by barricades and cones as the primary control and, where required other effective devices.
- **NC Sturgeon** must train workers in the traffic control safe work procedures.
- **NC Sturgeon** will ensure that before a worker is designated as a flag person, the worker is trained in the safe work procedures for the safe control of traffic operations and wears the appropriate high visibility outer clothing and/or equipment.
- If a worker at a project on a highway may be endangered by vehicular traffic unrelated to the project, the project shall make use of as many measures as necessary to adequately protect the worker.
- A worker who is required to set up or remove traffic control measures on a roadway or a shoulder of a roadway shall be a competent worker, shall be equipped with the appropriate high visibility apparel, shall not perform any other work while setting up or removing the measures and shall be given adequate written and oral instructions in a language that he or she understands, with respect to setting up or removing the measures.

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Scope

This policy is applicable to all **NC Sturgeon** employees and subcontractors. If subcontractors are used, they are required to comply with this policy and testing requirements. **NC Sturgeon** will also validate that the employees of the subcontractor have been tested to meet our client's requirements. **NC Sturgeon** is in full compliance with DOT regs 49CFR40 and 49CFR199. As a contractor who works extensively with natural gas and hazardous liquid pipeline operators and operators of liquefied natural gas facilities, we are required to be in compliance with DOT regulations. As of January 1, 1995, **NC Sturgeon** implemented the Research and Special Programs Administration (RSPA) Alcohol regulations as set forth in 49 CFR Part 199, B and 49 CFR Part 40, Subpart C.

Testing Requirements

Drug testing is performed using a certified collector to collect the urine specimen then sent to a SAMHSA (Substance Abuse and Mental Health Services Administration) certified laboratory for analysis. Quick screen and dip stick tests are not acceptable.

Frequency for Testing of Drugs and Alcohol

- Pre-Employment
- Post-Accident
- Random
- Reasonable Cause
- Return to Work
- Follow-Up as required

Drugs Being Tested For

The names of the drugs being tested for include:

- Marijuana
- Cocaine
- Opiates
- Amphetamines
- Phencyclidine

Records

NC Sturgeon must ensure that it will maintain appropriate records for as long as we have a contract with a client and then for 3 years after the termination of the contract. Examples include:

- Chain of custody forms
- Alcohol testing forms
- Signed acknowledgment/consent forms

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Policy

Any employee or subcontractor on duty or on **NC Sturgeon** property who possesses, sells, receives, is impaired or is determined to have measurable levels of any alcohol or illegal drug in their blood or urine (no matter the amount), post drug/alcohol screen, will be subject to immediate disciplinary action or contract dismissal.

We have a Zero Tolerance policy. ANY violation to the policy will result in the permanent removal of the employee from **NC Sturgeon** or our client's premises. **NC Sturgeon** does not have a return to duty process and will any employee or subcontractor violating this policy will be permanently banned from **NC Sturgeon** or client property.

NC Sturgeon prohibits firearms, weapons, explosives, etc. when working on **NC Sturgeon** or customer premises.

Drug and alcohol testing will be performed when there is reasonable suspicion or reasonable cause to suspect the employee of being under the influence of a prohibited substance. The employee(s) or subcontractor(s) removed for reasonable cause testing will not be allowed to return to work until receipt of a negative drug and alcohol test is received.

Alcohol testing must be performed by a breath, blood or saliva (with breath confirmation) test.

Drug and alcohol testing will be performed after an accident or incident. The employee(s) or subcontractor employee(s) will not be allowed to return to work on our clients' premises until documentation has been received showing the negative drug and alcohol test.

If an employee or subcontractor returns to work following an absence of more than 90 days a return to work screening shall occur. Follow up drug screening shall be applied when appropriate as determined by management.

NC Sturgeon must ensure that all employees who will be working on our client's jobsite must have received a negative result on a drug within the past 12 months.

NC Sturgeon prohibits the misuse of prescription or over the counter medications. Some types of medications could have undesirable effects, and these can create a safety risk and endanger the employee and others. Employees must notify his/her supervisor if taking a medication that might impair their ability.

Periodically, unannounced inspections will be made of persons entering or leaving **NC Sturgeon** work sites by authorized **NC Sturgeon** representatives. Entry onto **NC Sturgeon** or client property is deemed to have provided consent to an inspection of a person, locker, vehicle, or any other personal effects. Our clients have the right to conduct unannounced searches of your personnel and property and any employee who refuses to cooperate with the searches shall be removed from our clients' property.

Any refusals to submit to a drug/alcohol screen will be treated as a positive test, resulting in immediate contract dismissal or disciplinary action, up to and employment termination. The subcontractor or employee refusing to submit to the test will be asked to sign a refusal document. If they refuse to sign the document, it will be noted and kept on file.

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Drug and alcohol screening will be performed by an approved and qualified medical clinic with a medical review officer authorized to perform the tests. All results are treated with confidentiality. The switching or adulterating any urine, blood, or any other samples is a violation of this policy.

If another subcontractor or employee comes to management with concern regarding another subcontractor or employee in reference to alcohol or substance abuse, we will treat that with discretion and confidentiality. We will pursue investigation and decide accordingly whether a drug and or alcohol screen is the appropriate step to take.

All subcontractors and employees are subject to the policies explained above. This policy is to be posted in all facilities by the site supervisor.

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DRUG AND ALCOHOL POLICY ACKNOWLEDGEMENT FORM

I acknowledge that I have been provided a copy of the **NC Sturgeon** Drug and Alcohol Policy requirements. I understand that disciplinary action, up to and including termination, will result if I violate this policy.

Employee Signature

Date

Employee Printed Name

Social Security Number (last 4 digits)

CONSENT AND AUTHORIZATION FOR DISCLOSURE TO CLIENTS OF NC STURGEON OF ALCOHOL AND DRUG TEST RESULTS AND RELATED INFORMATION

I hereby consent to disclosure by **NC Sturgeon** and its agents, including, but not limited to, any collecting and testing agencies, of the test results identified above and any related information to clients of **NC Sturgeon** and its authorized agents, assigns, or representatives.

Employee Signature

Date

Employee Printed Name

Social Security Number (last 4 digits)

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Purpose

The purpose of this program is to assure a safe work environment during welding, cutting, and hot work operations.

Scope

This program is applicable to all employees directly involved or assisting in the welding, cutting and hot work operations. When work is performed on a no owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Operators of equipment should report any equipment defect or safety hazards and discontinue use of equipment until its safety has been assured. Repairs shall be made only by qualified personnel.

If fire hazards cannot be taken to a safe place or guards cannot be used to confine heat, sparks, slag and protect the immovable fire hazards, the welding and cutting shall not be performed.

Definitions

Welding/Hot Work Procedures - any activity which results in sparks, fire, molten slag, or hot material which has the potential to cause fires or explosions.

Examples of Hot Work - Cutting, Brazing, Soldering, Thawing Pipes, Grinding, using an electric tool in a hazardous area and Welding.

Special Hazard Occupancies - any area containing Flammable Liquids, Dust Accumulation, Gases, Plastics, Rubber and Paper Products.

Hazards - includes, but not limited to the following; fires and explosions, skin burns, welding "blindness", and respiratory hazards from fumes and smoke.

Key Responsibilities

Managers and Supervisors

- Determine if its property is safe for welding and cutting operations.
- Establish safe areas for welding and cutting operations.
- Provide training for all employees whose task includes heat, spark or flame producing operations such as welding, brazing, or grinding.
- Develop and monitor effective hot work procedures.
- Provide safe equipment for hot work.
- Provide proper and effective PPE for all hot work.
- Monitor all hot work operations.
- Ensure all hot work equipment and PPE are in safe working order.

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- Allow only trained and authorized employees to conduct hot work and conduct inspections of the hot work area before operations begin.
- Ensure permits are used for all hot work outside authorized areas.

Employees

- Follow all hot work procedures.
- Properly use appropriate hot work PPE.
- Inspect all hot work equipment before use.
- Report any equipment problems or unsafe conditions.

Procedure

General

A hot work permit must be completed before performing hot work. Precautions that are to be taken shall be in the form of a written permit. Before cutting or welding is permitted the area shall be inspected and a written permit shall be used to authorize welding and cutting operations.

Where practicable all combustibles shall be relocated at least 35 feet from the work site. Where relocation is impractical, combustibles shall be protected with flameproof covers, shielded with metal, guards, curtains, or wet down the material to help prevent ignition of material.

Ducts, conveyor systems, and augers that might carry sparks to distant combustibles shall be protected or shut down.

Where cutting or welding is done near walls, partitions, ceilings, or openings in the floor (grating, manholes, etc.), fire-resistant shields or guards shall be provided to prevent ignition.

If welding is to be done on a metal wall, partition, ceiling, or solid decking/flooring, precautions shall be taken to prevent ignition of combustibles on the other side, due to conduction or radiation of heat. Where combustibles cannot be relocated on the opposite side of the work, a fire watch person shall be provided on the opposite side of the work.

Welding shall not be attempted on a metal partition, wall, and ceiling or decking/flooring constructed of combustible sandwich panels.

Cutting or welding on pipes or other metal in contact with combustible walls, partitions, floors, ceilings, or roofs shall not be undertaken if the work is close enough to cause ignition by combustion.

Cutting or welding shall not be permitted in the following situations:

- In areas not authorized by management.
- In sprinkled buildings while such protection is impaired.
- In the presence of potentially explosive atmospheres, e.g. flammables.

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- In areas near the storage of large quantities of exposed, readily ignitable materials.
- In areas where there is dust accumulation of greater than 1/16 inch within 35 feet of the area where welding/hot work will be conducted.
- All dust accumulation shall be cleaned up before welding or hot work is permitted.

Whenever welding or cutting is performed in locations where other than a minor fire might develop or any of the conditions mentioned above cannot be met, a fire watch shall be provided.

- The fire watch shall be provided during and for a minimum of 1/2 hour past the completion of the welding project.
- The fire watch shall be trained in the use of fire extinguishers and the facility's alarm system.
- During this time the fire watch will have appropriate fire extinguishers readily available.
- Suitable extinguishers shall be provided and maintained ready for instant use.
- A hot-work permit will be issued on all welding or cutting outside of the designated welding area.

Fire Prevention Measures

A designated welding area shall be established to meet the following requirements:

- Floors swept and cleaned of combustibles within 35 feet of work area.
- Flammable and combustible liquids and material will be kept 35 feet from work area.
- Adequate ventilation providing 20 air changes per hour.
- At least one 10 pound dry chemical fire extinguisher shall be within access of 35 feet of the work area.
- Protective dividers such as welding curtains or noncombustible walls will be provided to contain sparks and slag to the combustible free area.

Requirements for welding conducted outside the designated welding area:

- Portable welding curtains or shields must be used to protect other workers in the welding area.
- A hot-work permit must be completed and complied with prior to initiating welding operations.
- Respiratory protection is mandatory unless an adequate monitored airflow away from the welder and others present can be established and maintained.
- Plastic materials must be covered with welding tarps during welding procedures.
- Fire Watch must be provided for all hot-work operations.

After welding operations are completed, the welder shall mark the hot metal or provide some other means of warning other workers.

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Confined Space

- A space that is large enough and so configured that an employee can bodily enter and perform assigned work;
- Has limited or restricted means for entry or exit (for example, tanks, vessels, coolers, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and
- Is not designed for continuous occupancy.

Refer to **NC Sturgeon's** Confined Space Program before commencing any welding, cutting, and/or brazing operations in an area meeting the requirements of a confined space.

Ventilation is a prerequisite to work in confined spaces.

When welding or cutting is being performed in any confined spaces, the gas cylinders and welding machines shall be left on the outside. Before operations are started, heavy portable equipment mounted on wheels shall be securely blocked to prevent accidental movement.

When a welder must enter a confined space through a manhole or other small opening, means shall be provided for quickly removing him in case of an emergency.

- When safety belts and lifelines are used for this purpose, they shall be so attached to the welder's body that it cannot be jammed in a small exit opening.
- An attendant with a preplanned rescue procedure shall be stationed outside to observe the welder at all times and be capable of putting rescue operations into effect.

When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes shall be removed from the holders and the holders carefully located so that accidental contact cannot occur and the machine shall be disconnected from the power source.

In order to eliminate the possibility of gas escaping through leaks of improperly closed valves, when gas welding or cutting, the torch valves shall be closed and the fuel-gas and oxygen supply to the torch positively shut off at some point outside the confined area whenever the torch is not to be used for a substantial period of time, such as during lunch hour or overnight. If practical, the torch and hose shall also be removed from the confined space.

When welding must be performed in a space entirely screened on all sides, the screens shall be so arranged that no serious restriction of ventilation exists. It is desirable to have the screens so mounted that they are about 2 feet (0.61 m) above the floor unless the work is performed at so low a level that the screen must be extended nearer to the floor to protect nearby workers from the glare of welding.

A fixed enclosure shall have a top and not less than two sides which surround the welding or cutting operations, and a rate of airflow sufficient to maintain a velocity away from the welder of not less than 100 linear feet (30 m) per minute.

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All welding and cutting operations carried on in confined spaces shall be adequately ventilated to prevent the accumulation of toxic materials or possible oxygen deficiency. This applies not only to the welder, but also to helpers and other personnel in the immediate vicinity. All air withdrawn will be replaced with air that is clean.

In circumstances for which it is impossible to provide such ventilation, airline respirators or hose masks approved for this purpose by the National Institute for Occupational Safety and Health (NIOSH) will be provided. In areas immediately hazardous to life, a full-face piece, positive pressure, self-contained breathing apparatus or a combination full-face piece, positive pressure supplied-air respirator with an auxiliary, self-contained air supply approved by NIOSH must be used.

Where welding operations are carried on in confined spaces and where welders and helpers are provided with hose masks, hose masks with blowers or self-contained breathing equipment, a worker shall be stationed on the outside of such confined spaces to ensure the safety of those working within.

Fumes, Gases and Dust

Fumes produced by some welding processes can be toxic and may require source extraction. An assessment of the work to be performed must be completed before each job is undertaken. Fumes generally contain particles from the material being welded. Welding fumes can have an acute effect on the respiratory system.

Any welding, cutting or burning of lead base metals, zinc, cadmium, mercury, fluorides, beryllium or exotic metals or paints not listed here that could produce dangerous fumes shall have proper ventilation or respiratory protection. This includes inert-gas metal-arc welding or oxygen cutting of stainless steel.

Welders and helpers will refer to **NC Sturgeon's** Respiratory Protection Program to determine the appropriate respiratory protection to be used during welding operations.

All welding and cutting operations shall be adequately ventilated to prevent the accumulation of toxic materials. This applies not only to the welder, but also to helpers and other personnel in the immediate vicinity.

Personal Protection

Helmets and hand shields shall be made of a material, which is an insulator for heat and electricity. Helmets, shields, and goggles shall not be readily flammable and shall be capable of withstanding sterilization.

Helmets and hand shields shall be arranged to protect the face, neck and ears from direct radiant energy from the arc.

Helmets shall be provided with filter plates and cover plates designed for easy removal.

All parts shall be constructed of a material, which will not readily corrode or discolor the skin.

Goggles shall be ventilated to prevent fogging of the lenses as much as practicable.

All glass for lenses shall be tempered, substantially free from scratches, air bubbles, waves and other flaws. Except when a lens is ground to provide proper optical vision correction, the front and rear surfaces of lenses and windows shall be smooth and parallel.

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Lenses shall bear some permanent distinctive marking which may readily identify the source and shade.

The following is a guide for the selection of the proper shade numbers. These recommendations may be varied to suit the individual's needs.

Welding Operation		Shade Number
Shielded metal — arc welding 1/16, 3/32, 1/8-5/32 inch electrodes		10
Gas-shielded arc welding (nonferrous) 1/16, 3/32, 5/32 inch electrodes		11
Gas-shielded arc welding (ferrous) 1/16, 3/32, 1/8, 5/32 electrodes		12
Shielded metal arc welding: 3/16	7/32, 1/4 inch electrodes	12
	5/16, 3/8-inch electrodes	14
Atomic hydrogen welding		10 – 14
Carbon arc welding		14
Soldering		2
Torch brazing		3 or 4
Light cutting, hp to 1 inch		3 or 4
Medium cutting, 1 inch to 6 inches		4 or 5
Heavy cutting, 6 inches or over		5 or 6
Gas welding (light) up to 1/8 inch		4 or 5
Gas welding (medium) 1/8 - 1/2 inch		5 or 6
Gas welding (heavy) 1/2 inch or over		6 or 8

NOTE:

In gas welding or oxygen cutting where the torch produces a high yellow light, it is desirable to use a filter or lens that absorbs the yellow or sodium line in the visible light of the operation. All filter lenses and plates shall meet the test for transmission of radiant energy prescribed in ANSI Z87.1 — 1968 — American National standard Practice for Occupational and Educational Eye and face Protection. Where the work permits the welder to be enclosed in an individual booth painted with a finish of low reflectivity such as zinc oxide (an important factor for absorbing ultraviolet radiation) and lamp black, or shall be enclosed with noncombustible screens similarly painted. Booths and screens shall permit circulation of air at floor level. Workers or other persons adjacent to the welding areas shall be protected from the rays by noncombustible or flameproof screens or shields or shall be required to wear appropriate goggles.

Adequate hand protection and clothing must be used to protect the body from welding hazards.

Cleaning Compounds

In the use of cleaning materials, because of their possible toxicity or flammability, appropriate precautions such as manufacturer instructions shall be followed.

- Degreasing and other cleaning operations involving chlorinated hydrocarbons shall be so located that no vapors from these operations will reach or be drawn into the atmosphere surrounding any welding operation.

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- In addition, trichloroethylene and perchloroethylene shall be kept out of atmospheres penetrated by the ultraviolet radiation of gas-shielded welding operations.

Oxygen cutting, using a chemical flux, iron powder or gas shielded arc cutting for stainless steel shall be performed using mechanical ventilation adequate to remove the fumes generated.

Cylinders

Compressed gas cylinders shall be DOT-approved and legibly marked near the shoulder of the cylinder for the purpose of identifying the gas content with either the chemical or trade name of the gas.

- All compressed gas cylinder connections must comply with ANSI B57. 1-1965 Standards.
- Compressed gas cylinders shall be secured in an upright position at all times except, if necessary, for short periods of time while cylinders are actually being hoisted or carried.

All cylinders shall be kept away from sources of heat and from radiators and piping systems that may be used for grounding purposes. Cylinders and cylinder valves including couplings and regulators shall be kept free from oily or greasy substances and must not be handled with gloves or rags in the same condition.

Stored oxygen cylinders shall be kept at least 20 feet from the fuel gas cylinders or combustible materials, especially oil or grease, or separated by a non-combustible barrier at least 5 feet high with a fire rating of at least one-half hour. All empty cylinders shall have closed valves. Valve protection caps shall always be in place and hand-tight except when cylinders are in use or connected for use.

Cylinders shall not be kept in unventilated enclosures such as lockers and cupboards.

Fuel gas cylinders stored inside buildings shall be limited to a total capacity of 2000 cubic feet (300 pounds) of liquefied petroleum gas, except for those in actual use or attached ready for use.

All acetylene cylinders shall be stored valve-end up.

Assigned storage spaces shall be located where cylinders cannot be knocked over or damaged by falling objects or subject to tampering by unauthorized persons.

- Back flow protection shall be provided by an approved device that will prevent oxygen from flowing into the fuel-gas system or fuel from flowing into the oxygen system.
- An approved device that will prevent flame from passing into the fuel-gas system shall provide flashback protection.
- An approved pressure-relief device set at the appropriate pressure shall provide backpressure protection.

Special care must be taken when transporting gas cylinders:

- Cylinders must be secured with valve cap installed.
- Cylinders shall not be lifted by the valve protection caps, the regulators must be removed and cylinders shall not be dropped or permitted to strike each other.
- Removed regulators must be carried in the cab of the vehicle.

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- Cylinders shall not be tampered with nor should any attempt be made to repair them.
- They shall be handled carefully - rough handling, knocks, or falls are liable to damage the cylinder, valve or safety device and cause leakage.

Safety devices shall not be tampered with.

Arc Welding and Cutting

All personnel operating, installing, and maintaining welding equipment shall be qualified or trained to operate and maintain such equipment.

- All workmen assigned to operate or maintain equipment shall be familiar with and electrical welding equipment shall be chosen for safe operation and comply with applicable Requirements for Electric Arc Welding Standards to include: 29 CFR 1910.254, 29 CFR 1910.252 (a)(b) (c) and if gas shielded arc welding is done the must be familiar with the American Welding Society Standard A6-1-1966.
 - Arc welding equipment must be designed to meet conditions such as exposure to corrosive fumes, excessive humidity, excessive oil vapor, flammable gasses, abnormal vibration or shock, excessive dust and seacoast or shipboard conditions.
 - It shall be operated at recommended voltage in accordance to the manufacturer recommendations.
 - All leads shall be periodically inspected and replaced if insulation is broken or splices are unprotected.
 - Leads shall not be repaired with electrical tape.
- All ground connections shall be checked to determine that they are mechanically strong and electrically adequate for the required current.

A disconnecting switch or controller shall be provided at or near each welding machine along with over current protection.

All direct current machines shall be connected with the same polarity and all alternating current machines connected to the same phase of the supply circuit and with the same polarity.

- To prevent electrical contact with personnel, all electrode holders shall be placed where they do not make contact with persons, conducting objects or the fuel of compressed gas tanks.
- All cables with splices within 10 feet of the holder shall not be used.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

If an object to be welded or cut cannot be moved and if all the fire hazards cannot be removed, then guards shall be used to confine the heat sparks and slag and to protect the immovable fire hazards.

Resistance Welding

All personnel operating, installing, and maintaining welding equipment shall be qualified or trained to operate and maintain such equipment.

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- Voltage, interlocks, guarding, grounding and shields shall be in accordance with manufacturer recommendations.
- Precautions such as flash guarding, ventilation and shields shall be provided to control flashes, toxic elements and metal fumes.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

Transmission Pipeline

When arc welding is performed in wet conditions, or under conditions of high humidity, special protection against electric shock shall be supplied.

Pressure testing:

- In pressure testing of pipelines, the workers and the public shall be protected against injury by the blowing out of closures or other pressure restraining devices.
- Protection shall be provided against expulsion of loose dirt that may have become trapped in the pipe.

The welded construction of transmission pipelines shall be conducted in accordance with the Standard for Welding Pipelines and Related Facilities, API Std. 1104-1998.

Oxygen Fuel Gas Welding and Cutting:

Only approved apparatuses such as torches, regulators or pressure-reducing valves, setting generators and manifolds shall be used:

- Mixtures of fuel gases and air or oxygen may be explosive and must be guarded against.
- All hoses and hose connections shall comply with the Compressed Gas Association and Rubber Manufacturers' Associations' applicable standards.
- Workers in charge of the oxygen or fuel-gas supply equipment, including generators, shall be instructed and judged competent by the **NC Sturgeon** before being left in charge.

If the object to be welded or cut cannot readily be moved, all moveable fire hazards should be removed.

Fire Watch Requirements

A fire watch shall be under these conditions as a minimum and when welding, cutting, brazing and/or soldering is performed near combustible materials and/or locations where fire may develop:

- Locations where other than a minor fire might develop.
- Combustible materials are closer than 35 feet to the point of operation.
- Combustibles that are 35 feet or more away but are easily ignited.
- Wall or floor openings within a 35 feet radius of exposed combustible materials.
- Combustible materials are adjacent to the opposite side of metal partitions, ceilings or roofs.

Fire watch personnel shall be maintained at least a half an hour after welding or cutting operations have been completed and fire watchers shall have fire extinguishers readily available.

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			Revision Date:	Initial Version
	WELDING, CUTTING, HOTWORK PROGRAM			Revision No.
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First Aid Equipment

First aid equipment shall be available at all times. All injuries shall be reported as soon as possible for medical attention. First aid shall be rendered until medical attention can be provided.

Training

Training shall include:

- Position Responsibilities
- Cutters, welders and their supervisors must be suitably trained in the safe operations of their equipment and the safe use of the process.
- Fire Watch Responsibilities - specifically, the fire watch must know:
 - That their ONLY duty is Fire Watch.
 - When they can terminate the watch.
 - How to use the provided fire extinguisher(s).
 - Be familiar with facilities and how to activate fire alarm, if fire is beyond the incipient stage.
 - Operator Responsibilities
 - Contractor Responsibilities
 - Documentation requirements
 - Respirator Usage requirements
 - Fire Extinguisher training.

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			Revision Date:	Initial Version
CADMIUM AND HEXAVALENT CHROMIUM SAFETY			Revision No.	0
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Purpose:

The purpose of this program is to establish requirements for the use and handling of materials that expose employees to cadmium and/or hexavalent chromium.

Scope

This program covers all employees.

Key Responsibilities

Managers/Supervisors

- Shall ensure that all employees are aware of the proper work procedures for cadmium and hexavalent chromium
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.
- As part of the JSA and other hazard evaluation processes, identifies and evaluates chromium or cadmium hazards and potential exposures during planning and the conduct of work.
- Reviews and approves the Task-Specific Safety Analysis.
- As necessary, quantitatively determines the presence of chromium or cadmium in materials, substrates, and other media. This may involve the collection of samples for analysis by a qualified laboratory or field testing using acceptable test methods.
- Provides results of any chromium or cadmium survey to management/supervision, along with information regarding hazard potential and control measures. As appropriate, makes recommendations to management/supervision to maintain, modify, upgrade, or downgrade controls accordingly.
- Takes prompt corrective measures (or supports any Competent Person in this role) to eliminate hazards; such as recommending to management/supervision to implement or modify engineering, administrative, work practice, and personal protection (including respiratory protection) controls.
- Conducts periodic exposure assessment.
- As appropriate, assists management/supervision in ensuring that workers have the necessary training and medical surveillance based upon the activity and hazard.
- Ensures that medical monitoring is conducted in accordance with 29 CFR 1926.1126 (for chromium) or 29 CFR 1926.1127 (for cadmium) including imposition of work restrictions where appropriate and reviewing results of medical monitoring.
- In evaluating chromium or cadmium hazards and specifying controls for a job, (a) utilizes reliable historical exposure monitoring data generated for other similar operations or activities, (b) utilizes objective data, and/or (c) plans and conducts initial monitoring to determine exposures and assess the effectiveness of hazard controls.
- Conducts initial and periodic exposure monitoring in accordance with National Institute for Occupational Safety and Health (NIOSH)/OSHA methods if lacking historical or objective data.
- Maintains effective records of jobs monitored, so that a historical database can be used to specify controls and eliminate unnecessary and redundant monitoring for future activities.

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- Supports project management/supervision in responding to exposures above the PEL when workers were not adequately protected.
- As appropriate, participates in pre-job and daily worker briefings regarding task-specific chromium or cadmium hazards and controls, work practices/plans (such as JSAs), and other applicable information, including any changes that are made to controls or to the work practices or plans.

Employees

- Shall follow all requirements regarding the safe work procedures for cadmium and hexavalent chromium.

Cadmium Procedure

Compliance Program

A written compliance program shall be implemented when the PEL for cadmium is exceeded at a work site.

The following areas shall be addressed within the site compliance program and to ensure emergency plans are in place should a release of cadmium occur:

- Potential exposure determination including a description of each operation where cadmium is omitted, machinery use, material processed, controls in place, crew size, employee job responsibilities and maintenance practices.
- Air monitoring data or developing a justification for not conducting monitoring based on previous monitoring/historical data or objective data.
- Engineering controls including the specific means that will be employed to meet compliance.
- A report of technology considered in meeting the PEL.
- A detailed schedule of implementation.
- Consideration of respiratory protection.
- A documented, written plan for dealing with emergency situations involving a substantial release of cadmium.
- Work practice program.
- Other relevant information such as protective clothing, housekeeping, hygiene areas and practices (including consideration of shower facilities), consideration of medical surveillance, training and recordkeeping.

The written program must be reviewed and updated annually or more often to reflect significant changes in the compliance status for **NC Sturgeon**.

The program shall be provided for examination and copying upon request of affected employees, their representatives or OSHA officials.

Maintenance procedures while working on ventilation systems and changing of filters will be established. Procedures shall be developed and implemented to minimize employee exposure to cadmium when maintenance of ventilation systems and changing of filters. Examples include: Proper use of PPE, use of HEPA filtered vacuums, wet sweeping or other methods to minimize the likelihood of exposure to chromium. No compressed air shall be used to remove chromium from any surface. Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

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Construction work activities that result in exposure to chromium or cadmium may include, but are not limited to, the following:

- Demolition or salvage of structures where chromium or cadmium, or materials containing chromium or cadmium, are present.
- Removal or encapsulation of materials containing chromium or cadmium.
- New construction, alteration, repair, or renovation of structures and substrates that contain chromium or cadmium.
- Installation of products containing chromium or cadmium.
- Working with/around Portland cement (in powder or dust form – chromium only).
- Torch-cutting chromium/cadmium containing paints.
- Transportation, disposal, storage, or containment of chromium or cadmium, or materials containing chromium or cadmium.
- Maintenance operations associated with construction activities.
- Welding, cutting, burning, or grinding stainless steel, chromium-/cadmium-containing alloy steel, and chromium/cadmium containing alloys.

Note!!! Exposure to chromium (especially hexavalent chromium) has also occurred when the welding rod or wire in use contains chromium.

The permissible exposure limit (PEL) for cadmium and hexavalent chromium is five (5) micrograms calculated as an 8-hour time-weighted average over a work shift. The action level (AL) of 2.5 micrograms triggers the following requirements:

- Pre-job planning includes, as needed, a thorough identification of chromium or cadmium materials. Identification may include the product name, a Material Safety Data Sheet (MSDS) with the MSDS number (if available) or a sample content analysis. Sampling data includes location, sampling method, sampling dates, laboratory identification, and analytical method.
- If documentation is not feasible or has been determined by the project engineer to be unavailable or unreliable, chromium or cadmium content sufficient to exceed the action level for chromium or cadmium is assumed.

Results of bulk sampling, calculations of potential chromium or cadmium exposure, and other data that demonstrate compliance with this practice (as well as the pertinent standards) are attached to the work package.

Where chromium or cadmium exposure above the action level is suspected, and in the absence of monitoring data, interim protective measures are established that are equal to or greater than the assumed exposure level.

Hexavalent Chromium Procedure

Welding, Cutting, and Grinding

Certain welding and cutting activities have been shown to expose the welder/cutter, and potentially helpers, to hexavalent chromium above the action level when exhaust ventilation is not used. The activities have included the following:

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- Shielded metal arc welding, Gas metal arc welding
- Flux cored arc welding, Sub arc welding
- Torch cutting through chromate-containing paints, grinding chromium-containing metals.

The types of metal involved have been stainless steel, chromium-containing alloy steel, and chromium-containing nonferrous alloys. Exposure has also occurred when the welding rod or wire in use contains chromium, and exhaust ventilation is not used.

Therefore, exhaust ventilation is always prescribed as a control measure when activities with the materials mentioned above are in use unless historical personal monitoring data performed when similar materials, using similar methods, under similar environmental conditions are used shows conclusively that the welder/cutter and helper (if applicable) are not exposed above the action level without regard to respiratory protection.

No employee shall be exposed in excess of the PEL of 5 micrograms per cubic meter of air as an 8-hour TWA. Employees shall not be exposed in excess of the permissible exposure level.

Plasma and Air Arc Cutting and Gouging

Plasma and air arc cutting and gouging operations have been shown to expose the worker and helpers within 10 feet of the work to levels of hexavalent chromium above the permissible exposure limit (PEL) under most circumstances and conditions. Exhaust ventilation and respiratory protection (at least a half-face, tight-fitting respirator with a HEPA filter/cartridge) are always prescribed as control measures when activities with the materials mentioned above are in use; a higher level of respiratory protection may be prescribed, depending on conditions.

Note!!! Each discrete task must begin with ventilation and respiratory protection control measures in place. Respiratory protection may be downgraded only upon conclusive results of breathing zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than 50 percent of the protection factor of the respirator relative to the concentration and PEL of hexavalent chromium. Respiratory protection may be eliminated only upon conclusive results of breathing-zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than the PEL as an 8-hour time-weighted average.

Additional controls may also be appropriate to be in compliance with 29 CFR 1926.1126, depending on the results of evaluations of the materials to be used, environmental conditions, length of the work process/activity, etc.

Medical Surveillance

Medical surveillance must be provided to employees who are exposed above the PEL for 30 days or more per year or exposed in an emergency. Medical surveillance shall be provided when an employee experiences signs or symptoms of the adverse health effects of Hexavalent Chromium (dermatitis, asthma, bronchitis, etc.). Medical evaluations will be provided at no cost to employees. Examinations will be performed by or under the supervision of a physician or other licensed health care professional.

Hygiene

Personal hygiene is very important while working with chromium or cadmium products. To avoid accidental ingestion of chromium or cadmium, employees wash thoroughly (regardless of other controls) prior to eating, chewing, smoking, or drinking.

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Practices

NC Sturgeon Management/supervision supported by safety professional(s), the medical contractor and training providers conduct the following basic steps to control exposure to chromium or cadmium:

- Determine the types of projects, activities, and operations that could involve chromium or cadmium, or chromium or cadmium-containing materials. For those jobs, conduct hazard identification as part of the work design, planning, and control process.
- If chromium or cadmium materials are involved, ensure that project safety (for chromium) or a competent person (for cadmium) conducts a hazard evaluation to determine the potential exposure and to recommend initial controls.
- Develop and implement a Task-Specific Safety when exposure is or is likely to be above the PEL. The JSA (or equal) addresses the scope of work activities; provides initial exposure assessment; and prescribes exposure controls, air-monitoring requirements, work practices, personal protective equipment and additional information as required.
- Incorporate recommendations from project safety for chromium or cadmium hazard control measures into any JSA and work control documents.

Exposure Monitoring

Periodic monitoring shall be conducted at least every 6 months if initial monitoring shows employee exposure. Air monitoring will be performed at the beginning of each job task. If exposure monitoring results indicate exposure is above the PEL, a written notification must be included with the corrective action being taken to reduce exposure to or below the PEL.

- Notify each affected employee, in writing, of the results of monitoring within five (5) working days.
- Air monitoring for chromium or cadmium may be waived provided the following conditions are met:
 - Monitoring has been performed in the last 12 months.
 - Data from historical monitoring originates from work operations that closely resemble the planned work operations.
 - Workplace and environmental conditions (such as indoors or outdoors, temperature, wind speed, ventilation, and space configuration) are similar to those when the monitoring was performed.
 - The processes, types of material, control methods and work practices are similar.
 - Justification for waving initial monitoring shall be included in the Task-Specific Safety Analysis or equal. Employees involved are briefed regarding the existence of such data.

Surveillance

Medical surveillance shall be provided when an employee experiences signs or symptoms of the adverse health effects of Hexavalent Chromium (dermatitis, asthma, bronchitis, etc.). Medical evaluations will be provided at no cost to employees. Examinations will be performed by or under the supervision of a physician or other licensed health care professional.

Changing and Hygiene Facilities Are Provided for Decontamination

NC Sturgeon must provide change rooms for decontamination and ensure facilities prevent cross-contamination. Washing facilities shall be readily accessible for removing chromium from the skin. Workers must wash their hands and face or any other potentially exposed skin before eating, drinking or smoking.

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Regulated Areas

Regulated areas shall be established when exposure to an employee is or is expected to be in excess of the PEL. Regulated areas shall be marked with warning signs to alert employees and access is restricted to authorized persons only.

Controls

NC Sturgeon is responsible for implementing effective engineering and work practice controls if the exposure level is above the permissible limit for more than 30 days per year. Engineering and work practice controls should be provided to reduce exposure to the lowest feasible level. If employees can demonstrate that such controls are not feasible, **NC Sturgeon** shall use engineering/work controls to reduce employee exposure to the lowest levels achievable, and shall supplement them by the use of respiratory protection.

Recordkeeping

NC Sturgeon is required to maintain and make available an accurate record of all employee exposure monitoring, medical surveillance and training records.

Respiratory Protection is Required & PPE

Respirators must be used when engineering controls and work practices cannot reduce employee exposure, during work operations where engineering controls and work practices are not feasible, and emergencies.

Respirators shall be provided in accordance with 1910.134 (Respiratory Protection) (see **NC Sturgeon** Respiratory Protection Program). Specific requirements contained within 1926.1127 (Cadmium) regarding respiratory protection shall also be followed including:

- Providing employees with full face piece respirators when they experience eye irritation.
- Providing HEPA filters for powered and non-powered air-purifying respirators.
- Providing a powered air-purifying respirator instead of a negative-pressure respirator when an employee entitled to a respirator chooses to use this type of respirator and such a respirator will provide adequate protection to the employee.

PPE will be provided at employees at no cost. PPE must be provided when there is a hazard from skin or eye contact. Gloves, aprons, coveralls, goggles, foot covers etc.

Contaminated PPE will be removed at the end of the work shift. **NC Sturgeon** must clean, launder, repair and replace protective clothing as needed.

Housekeeping

Surfaces shall be maintained as free as practicable of accumulation of chromium.

All spills and releases of chromium shall be cleaned promptly. Methods of cleaning include HEPA filtered vacuums, dry or wet sweeping, shoveling or other methods to minimize exposure.

No compressed air shall be used to remove chromium from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the dust cloud created by the compressed air or no alternative method is feasible.

Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

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Training of Employees

NC Sturgeon shall provide appropriate types of training for employees who are potentially exposed to chromium or cadmium prior to their initial assignment and annually thereafter. NC Sturgeon will assure employee participation and maintain a record of the training contents. This training includes:

- Hazard communication training for potentially exposed employees.
- Chromium hazards, control methods and medical surveillance.
- Training specified by the applicable chromium or cadmium standard for workers exposed at the action level for any one day, or who are exposed to chromium or cadmium compounds that are skin irritants.
- Respirator training if respirators are to be used.
- Provide information to workers regarding task-specific chromium or cadmium hazards and control methods, the JSA, work practices, medical surveillance and other applicable information, including any changes that are made to these controls.
- Provide training annually, as appropriate, to workers who continue to have exposure to chromium or cadmium at or above the action level on any one day.
- All training will be recorded and include the identity of the employee trained, the signature of the person who conducted the training and the date of the training.
- Training records must be kept for one year.

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Purpose

Overhead cranes, hoists, and rigging equipment are used by **NC Sturgeon** employees for lifting and moving materials. In order to maintain a safe workplace for its employees and comply with new regulations, only qualified individuals shall operate these devices. This program outlines the procedures for safe operations and the training requirements regarding overhead cranes, hoists and rigging equipment.

Scope

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

Definitions

A/D director (Assembly/Disassembly director) means an individual who meets this subpart's requirements for an A/D director, irrespective of the person's formal job title or whether the person is non-management or management personnel.

Articulating crane means a crane whose boom consists of a series of folding, pin connected structural members, typically manipulated to extend or retract by power from hydraulic cylinders.

Assembly/Disassembly means the assembly and/or disassembly of equipment covered under this standard. With regard to tower cranes, "erecting and climbing" replaces the term "assembly," and "dismantling" replaces the term "disassembly." Regardless of whether the crane is initially erected to its full height or is climbed in stages, the process of increasing the height of the crane is an erection process.

Assist crane means a crane used to assist in assembling or disassembling a crane.

Attachments means any device that expands the range of tasks that can be done by the equipment. Examples include, but are not limited to: an auger, drill, magnet, pile-driver, and boom-attached personnel platform.

Audible signal means a signal made by a distinct sound or series of sounds. Examples include, but are not limited to, sounds made by a bell, horn, or whistle.

Blocking (also referred to as "cribbing") is wood or other material used to support equipment or a component and distribute loads to the ground. It is typically used to support lattice boom sections during assembly/ disassembly and under outrigger and stabilizer floats.

Boatswain's chair means a single-point adjustable suspension scaffold consisting of a seat or sling (which may be incorporated into a full body harness) designed to support one employee in a sitting position.

Bogie means "travel bogie," which is defined below.

Boom (equipment other than tower crane) means an inclined spar, strut, or other long structural member which supports the upper hoisting tackle on a crane or derrick. Typically, the length and vertical angle of the boom can be varied to achieve

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increased height or height and reach when lifting loads. Booms can usually be grouped into general categories of hydraulically extendible, cantilevered type, latticed section, cable supported type or articulating type.

Boom (tower cranes): On tower cranes, if the “boom” (i.e., principal horizontal structure) is fixed, it is referred to as a jib; if it is moveable up and down, it is referred to as a boom.

Boom angle indicator means a device which measures the angle of the boom relative to horizontal.

Boom hoist limiting device includes boom hoist disengaging device, boom hoist shutoff, boom hoist disconnect, boom hoist hydraulic relief, boom hoist kick-outs, automatic boom stop device, or derricking limiter. This type of device disengages boom hoist power when the boom reaches a predetermined operating angle. It also sets brakes or closes valves to prevent the boom from lowering after power is disengaged.

Boom length indicator indicates the length of the permanent part of the boom (such as ruled markings on the boom) or, as in some computerized systems, the length of the boom with extensions/attachments.

Boom stop includes boom stops, (belly straps with struts/standoff), telescoping boom stops, attachment boom stops, and backstops. These devices restrict the boom from moving above a certain maximum angle and toppling over backward.

Boom suspension system means a system of pendants, running ropes, sheaves, and other hardware which supports the boom tip and controls the boom angle.

Builder means the builder/constructor of equipment.

Center of gravity: The center of gravity of any object is the point in the object around which its weight is evenly distributed. If you could put a support under that point, you could balance the object on the support.

Certified welder means a welder who meets nationally recognized certification requirements applicable to the task being performed.

Climbing means the process in which a tower crane is raised to a new working height, either by adding additional tower sections to the top of the crane (top climbing), or by a system in which the entire crane is raised inside the structure (inside climbing).

Come-a-long means a mechanical device typically consisting of a chain or cable attached at each end that is used to facilitate movement of materials through leverage.

Competent person means 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.

Controlled load lowering means lowering a load by means of a mechanical hoist drum device that allows a hoisted load to be lowered with maximum control using the gear train or hydraulic components of the hoist mechanism. Controlled load lowering requires the use of the hoist drive motor, rather than the load hoist brake, to lower the load.

Controlling entity means an employer that is a prime contractor, general contractor, construction manager or any other legal entity which has the overall responsibility for the construction of the project – its planning, quality and completion.

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Counterweight means a weight used to supplement the weight of equipment in providing stability for lifting loads by counterbalancing those loads.

Crane/derrick includes all equipment covered by this subpart.

Crawler crane means equipment that has a type of base mounting which incorporates a continuous belt of sprocket driven track.

Crossover points means locations on a wire rope which is spooled on a drum where one layer of rope climbs up on and crosses over the previous layer. This takes place at each flange of the drum as the rope is spooled onto the drum, reaches the flange, and begins to wrap back in the opposite direction.

Dedicated channel means a line of communication assigned by the employer who controls the communication system to only one signal person and crane/derrick or to a coordinated group of cranes/derricks/signal person(s).

Dedicated pile-driver is a machine that is designed to function exclusively as a pile driver. These machines typically have the ability to both hoist the material that will be pile-driven and to pile-drive that material.

Dedicated spotter (power lines): To be considered a dedicated spotter, the requirements of § 1926.1428 (Signal person qualifications) must be met and his/her sole responsibility is to watch the separation between the power line and: the equipment, load line and load (including rigging and lifting accessories), and ensure through communication with the operator that the applicable minimum approach distance is not breached.

Directly under the load means a part or all of an employee is directly beneath the load.

Dismantling includes partial dismantling (such as dismantling to shorten a boom or substitute a different component).

Drum rotation indicator means a device on a crane or hoist which indicates in which direction and at what relative speed a particular hoist drum is turning.

Electrical contact occurs when a person, object, or equipment makes contact or comes in close proximity with an energized conductor or equipment that allows the passage of current.

Employer-made equipment means floating cranes/derricks designed and built by an employer for the employer's own use.

Encroachment is where any part of the crane, load line or load (including rigging and lifting accessories) breaches a minimum clearance distance that this subpart requires to be maintained from a power line.

Equipment means equipment covered by this subpart.

Equipment criteria means instructions, recommendations, limitations and specifications.

Fall protection equipment means guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems.

Fall restraint system means a fall protection system that prevents the user from falling any distance. The system is comprised of either a body belt or body harness, along with an anchorage, connectors and other necessary equipment. The other components typically include a lanyard, and may also include a lifeline and other devices.

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Fall zone means the area (including but not limited to the area directly beneath the load) in which it is reasonably foreseeable that partially or completely suspended materials could fall in the event of an accident.

Flange points are points of contact between rope and drum flange where the rope changes layers.

Floating cranes/derricks means equipment designed by the manufacturer (or employer) for marine use by permanent attachment to a barge, pontoons, vessel or other means of flotation.

For example means “one example, although there are others.”

Free fall (of the load line) means that only the brake is used to regulate the descent of the load line (the drive mechanism is not used to drive the load down faster or retard its lowering).

Free surface effect is the uncontrolled transverse movement of liquids in compartments which reduce a vessel’s transverse stability.

Hoist means a mechanical device for lifting and lowering loads by winding a line onto or off a drum.

Hoisting is the act of raising, lowering or otherwise moving a load in the air with equipment covered by this standard. As used in this standard, “hoisting” can be done by means other than wire rope/ hoist drum equipment.

Include/including means “including, but not limited to.”

Insulating link/device means an insulating device listed, labeled, or accepted by a Nationally Recognized Testing Laboratory in accordance with 29 CFR 1910.7.

Jib stop (also referred to as a jib backstop), is the same type of device as a boom stop but is for a fixed or luffing jib.

Land crane/derrick is equipment not originally designed by the manufacturer for marine use by permanent attachment to barges, pontoons, vessels, or other means of flotation.

List means the angle of inclination about the longitudinal axis of a barge, pontoons, vessel or other means of flotation.

Load refers to the object(s) being hoisted and/or the weight of the object(s); both uses refer to the object(s) and the load-attaching equipment, such as, the load block, ropes, slings, shackles, and any other ancillary attachment.

Load moment (or rated capacity) indicator means a system which aids the equipment operator by sensing (directly or indirectly) the overturning moment on the equipment, i.e., load multiplied by radius. It compares this lifting condition to the equipment’s rated capacity, and indicates to the operator the percentage of capacity at which the equipment is working. Lights, bells, or buzzers may be incorporated as a warning of an approaching overload condition.

Load moment (or rated capacity) limiter means a system which aids the equipment operator by sensing (directly or indirectly) the overturning moment on the equipment, i.e., load multiplied by radius. It compares this lifting condition to the equipment’s rated capacity, and when the rated capacity is reached, it shuts off power to those equipment functions which can increase the severity of loading on the equipment, e.g., hoisting, telescoping out, or luffing out. Typically, those functions which decrease the severity of loading on the equipment remain operational, e.g., lowering, telescoping in, or luffing in.

Locomotive crane means a crane mounted on a base or car equipped for travel on a railroad track.

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Luffing jib limiting device is similar to a boom hoist limiting device, except that it limits the movement of the luffing jib.

Marine hoisted personnel transfer device means a device, such as a “transfer net,” that is designed to protect the employees being hoisted during a marine transfer and to facilitate rapid entry into and exit from the device. Such devices do not include boatswain’s chairs when hoisted by equipment covered by this standard.

Marine worksite means a construction worksite located in, on or above the water.

Mobile crane means a lifting device incorporating a cable suspended latticed boom or hydraulic telescopic boom designed to be moved between operating locations by transport over the road.

Moving point-to-point means the times during which an employee is in the process of going to or from a work station.

Multi-purpose machine means a machine that is designed to be configured in various ways, at least one of which allows it to hoist (by means of a winch or hook) and horizontally move a suspended load. For example, a machine that can rotate and can be configured with removable forks/tongs (for use as a forklift) or with a winch pack, jib (with a hook at the end) or jib used in conjunction with a winch. When configured with the forks/tongs, it is not covered by this subpart. When configured with a winch pack, jib (with a hook at the end) or jib used in conjunction with a winch, it is covered by this subpart.

Nationally recognized accrediting agency is an organization that, due to its independence and expertise, is widely recognized as competent to accredit testing organizations. Examples of such accrediting agencies include, but are not limited to, the National Commission for Certifying Agencies and the American National Standards Institute.

Nonconductive means that, because of the nature and condition of the materials used, and the conditions of use (including environmental conditions and condition of the material), the object in question has the property of not becoming energized (that is, it has high dielectric properties offering a high resistance to the passage of current under the conditions of use).

Operational aids are devices that assist the operator in the safe operation of the crane by providing information or automatically taking control of a crane function. These include, but are not limited to, the devices listed in § 1926.1416 (“listed operational aids”).

Operational controls means levers, switches, pedals and other devices for controlling equipment operation.

Operator means a person who is operating the equipment.

Overhead and gantry cranes includes overhead/bridge cranes, semigantry, cantilever gantry, wall cranes, storage bridge cranes, launching gantry cranes, and similar equipment, irrespective of whether it travels on tracks, wheels, or other means.

Paragraph refers to a paragraph in the same section of this subpart that the word “paragraph” is used, unless otherwise specified.

Pendants includes both wire and bar types. Wire type: a fixed length of wire rope with mechanical fittings at both ends for pinning segments of wire rope together. Bar type: instead of wire rope, a bar is used. Pendants are typically used in a latticed boom crane system to easily change the length of the boom suspension system without completely changing the rope on the drum when the boom length is increased or decreased.

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Personal fall arrest system means a system used to arrest an employee in a fall from a working level. It consists of an anchorage, connectors, a body harness and may include a lanyard, deceleration device, lifeline, or suitable combination of these.

Portal crane is a type of crane consisting of a rotating upperstructure, hoist machinery, and boom mounted on top of a structural gantry which may be fixed in one location or have travel capability. The gantry legs or columns usually have portal openings in between to allow passage of traffic beneath the gantry.

Power lines means electric transmission and distribution lines.

Procedures include, but are not limited to: instructions, diagrams, recommendations, warnings, specifications, protocols and limitations.

Proximity alarm is a device that provides a warning of proximity to a power line and that has been listed, labeled, or accepted by a Nationally Recognized Testing Laboratory in accordance with 29 CFR 1910.7.

Qualified evaluator (not a third party) means a person employed by the signal person's employer who has demonstrated that he/she is competent in accurately assessing whether individuals meet the Qualification Requirements in this subpart for a signal person.

Qualified evaluator (third party) means an entity that, due to its independence and expertise, has demonstrated that it is competent in accurately assessing whether individuals meet the Qualification Requirements in this subpart for a signal person.

Qualified person means a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training and experience, successfully demonstrated the ability to solve/resolve problems relating to the subject matter, the work, or the project.

Qualified rigger is a rigger who meets the criteria for a qualified person.

Range control limit device is a device that can be set by an equipment operator to limit movement of the boom or jib tip to a plane or multiple planes.

Range control warning device is a device that can be set by an equipment operator to warn that the boom or jib tip is at a plane or multiple planes.

Rated capacity means the maximum working load permitted by the manufacturer under specified working conditions. Such working conditions typically include a specific combination of factors such as equipment configuration, radii, boom length, and other parameters of use.

Rated capacity indicator: See load moment indicator.

Rated capacity limiter: See load moment limiter.

Repetitive pickup points refer to, when operating on a short cycle operation, the rope being used on a single layer and being spooled repetitively over a short portion of the drum.

Running wire rope means a wire rope that moves over sheaves or drums.

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Runway means a firm, level surface designed, prepared and designated as a path of travel for the weight and configuration of the crane being used to lift and travel with the crane suspended platform. An existing surface may be used as long as it meets these criteria.

Section means a section of this subpart, unless otherwise specified.

Sideboom crane means a track-type or wheel-type tractor having a boom mounted on the side of the tractor, used for lifting, lowering or transporting a load suspended on the load hook. The boom or hook can be lifted or lowered in a vertical direction only.

Special hazard warnings means warnings of site-specific hazards (for example, proximity of power lines).

Stability (flotation device) means the tendency of a barge, pontoons, vessel or other means of flotation to return to an upright position after having been inclined by an external force.

Standard Method means the protocol in Appendix A of this subpart for hand signals.

Such as means “such as, but not limited to.”

Superstructure: See Upperworks.

Tagline means a rope (usually fiber) attached to a lifted load for purposes of controlling load spinning and pendular motions or used to stabilize a bucket or magnet during material handling operations.

Tender means an individual responsible for monitoring and communicating with a diver.

Tilt up or tilt down operation means raising/lowering a load from the horizontal to vertical or vertical to horizontal.

Tower crane is a type of lifting structure which utilizes a vertical mast or tower to support a working boom (jib) in an elevated position. Loads are suspended from the working boom. While the working boom may be of the fixed type (horizontal or angled) or have luffing capability, it can always rotate to swing loads, either by rotating on the top of the tower (top slewing) or by the rotation of the tower (bottom slewing). The tower base may be fixed in one location or ballasted and moveable between locations. Mobile cranes that are configured with luffing jib and/or tower attachments are not considered tower cranes under this section.

Travel bogie (tower cranes) is an assembly of two or more axles arranged to permit vertical wheel displacement and equalize the loading on the wheels.

Trim means angle of inclination about the transverse axis of a barge, pontoons, vessel or other means of flotation.

Two blocking means a condition in which a component that is uppermost on the hoist line such as the load block, hook block, overhaul ball, or similar component, comes in contact with the boom tip, fixed upper block or similar component. This binds the system and continued application of power can cause failure of the hoist rope or other component.

Unavailable procedures means procedures that are no longer available from the manufacturer, or have never been available, from the manufacturer.

Upperstructure: See Upperworks.

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Upperworks means the revolving frame of equipment on which the operating machinery (and many cases the engine) are mounted along with the operator's cab. The counterweight is typically supported on the rear of the upperstructure and the boom or other front end attachment is mounted on the front.

Up to means "up to and including."

Wire rope means a flexible rope constructed by laying steel wires into various patterns of multi-wired strands around a core system to produce a helically wound rope.

What is Not Defined as a Crane

- Forklifts, Track Loaders, Excavators (Track Hoe/Backhoe), Concrete Pump Trucks w/boom
- Power Shovels, Digger Derricks, Tow Trucks, Vehicle Mounted Work Platforms
- Self-propelled Elevating Work Platforms, Stacker Cranes, Mechanic's Trucks With Hoisting Devices
- Come-A-Longs and Chain Falls, Gin Poles For Communication Tower Work
- Tree Trimming and tree removal work
- Anchor handling with a vessel or barge using an affixed A-frame

Key Responsibilities

Managers and Supervisors

- Are responsible to ensure that employees and contractors are trained and qualified on the proper operations and have been trained in crane and hoist safety.
- Shall ensure modifications or additions that may affect the capacity or safe operation of the equipment must not be made without written approval from the manufacturer or approval from a registered professional engineer. The manufacturer must approve all modifications/additions in writing. A registered professional engineer must be qualified with respect to the equipment involved and must ensure the original safety factor of the equipment is not reduced.
- Shall ensure all manufacturer procedures applicable to the operational function of equipment must be complied with. All manufacturer procedures applicable to the operational functions of equipment, including its use with attachments, must be complied with.
- Are responsible to see that all provisions of this program are followed and that crane inspections are performed and the equipment is in safe operating condition.
- Are responsible for identifying hazard areas by marking the boundaries of the crane swing radius with warning lines, railings or similar barriers or other safety measures to be used when the equipment has the potential to strike and injure an employee or pinch/crush an employee against any other object.

Employees

- Employee operators are responsible to follow the requirements of this program and report any damage or needed repairs immediately to their supervisor.
- Operators must meet the physical qualifications, pass a physical, a written examination, understand and be able to use a load chart as well as calculate loads for the crane type operated.

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- Employees designated as crane operators are responsible for the entire lift. In addition, crane operators are responsible to:
 - Make the required inspections,
 - Ensure that the crane is maintained,
 - Ensure that all personnel working in the area around the crane are kept clear of all hazards related to crane operations.
 - Determine the weights, and correct rigging required for loads to be lifted.

Crane Operator Certification/Qualification

Operators must be determined to be qualified before they are permitted to operate any crane. Only those employees qualified by training or experience shall be allowed to operate equipment and machinery.

Within 4 years of November 8th 2010 NC Sturgeon must ensure operators must be qualified/certified by one of the following methods:

Certification by an Accredited Crane Operator Testing Organization

- Accredited by a nationally recognized accrediting agency
- Certification is portable
- Valid for five years
- Program must be reviewed by a nationally recognized accrediting agency every three years

Qualification by an Audited Employer Program

- Developed or approved by an auditor certified by an accredited crane operator testing organization
- Auditor is not an employee of NC Sturgeon
- Tests should be administered per nationally recognized test administration standards
- Program shall be audited within the first three months, then once every three years
- Qualification is not portable and valid for five years

Qualification by the U.S. Military

Licensing by a Government Entity

- Must meet or exceed requirements of the OSHA standard
- Valid only within the jurisdiction of the government entity
- Valid for time specified by the government entity, but no longer than five years

Certification/Qualification Criteria

Pass written test that include:

- Controls and operational performance
- Ability to calculate the load/capacity
- Procedures for power line contact
- Site preparation
- Ability to read manuals/charts relevant to the equipment being operated

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Pass practical examination

Ability to perform a pre-shift inspection

Operational and maneuvering skills

Application of load chart information

Application of safe shut down and securing procedures

Administrative Criteria

- NC Sturgeon must revoke operator's certification if they have reason to believe the employee is not qualified to operate.
- The current training records must be on file during the operator's employment.

Rigger Qualifications

Riggers assemble, rig, hook and unhook, guide, and disassemble crane equipment and materials. Riggers must meet the requirements of a qualified person. A qualified rigger is a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to resolve problems relating to the subject matter, the work, or the project.

Riggers must be trained in all the requirements of the regulations that apply to their respective roles. For example, riggers must be trained and qualified to perform assembly and disassembly operations when their job tasks require them to perform such operations.

Signal Person Qualification

All signal persons must be qualified to give signals. In order to be qualified, the signal person must:

- Know and understand the type of signals used; if hand signals are used, the signal person must know and understand the Standard Method for hand signals.
- Be competent in the application of the type of signals used.
- Have a basic understanding of equipment operation and limitations, including the crane dynamics involved in swinging and stopping loads and boom deflection from hoisting loads.
- Know and understand the regulatory requirements for signals (29 CFR 1926.1419 to 1926.1422) and the signal person qualifications (29 CFR 1926.1428).
- Demonstrate that he or she meets the qualification requirements for signalers through an oral or written test and through a practical test.

Signal Person Evaluations

The qualification of signal persons must be evaluated and documented by either:

- A third party qualified evaluator, or
- The employer's qualified evaluator (i.e., an employee competent in accurately assessing whether the signaler has met the qualification requirements)

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Signal Person Refresher Training

If subsequent actions by the signal person indicate that the individual does not meet the Qualification Requirements, NC Sturgeon must not allow the individual to continue working as a signal person until retraining is provided and a reassessment is made that confirms that the individual meets the Qualification Requirements.

Documentation of Signaler Qualification

NC Sturgeon must make the documentation for whichever option is used available at the site while the signal person is employed by NC Sturgeon. The documentation must specify each type of signaling (e.g. hand signals, radio signals) for which the signal person meets the requirements of the rule.

Authority to Stop Operations

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

Ground Conditions

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

NC Sturgeon will locate all hazards that are identified in all available documents and inform the crane user of them.

Overhead Power Lines in Crane Operations

- No part of crane, line or load may be able to reach within 20 feet of a power line during setup. Exceptions: de-energized and grounded power lines or use of a dedicated spotter or proximity alarms.
- Assembly/disassembly below power lines is prohibited, unless line is de-energized and grounded.
- All power lines are presumed to be energized unless confirmed to be de-energized by the utility owner/operator and visibly grounded at the worksite.
- All power lines presumed to be un-insulated.
- Employees shall understand limitations of insulating links, proximity alarms and range control devices, if used.
- Dedicated spotters shall be trained.
- There must be at least one electrocution hazard warning sticker conspicuously placed in the cab of the crane.

Power Lines

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

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equipment up to the maximum working radius. The hazard assessment must determine if any part of the equipment could get closer than 20 feet to a power line.

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

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

Voltage (kV)	Minimum Clearance Distance(feet)
Up to 50	10
50 to 200	15
200 to 350	20
350 to 500	25
500 to 750	35
750 to 1000	45
Over 1000	As established by the line owner

Some special requirements for working below power lines include training of operators and crew on:

- Procedures to follow after power line contact
- Danger of a potential energized zone
- Operator's emergency procedures
- Safest means to evacuate equipment
- Need for employees to avoid approach
- Safe clearance from power lines

Required Equipment

Mandatory Safety Devices Equipment

All safety devices must be in proper working order before operation begins. Safety devices are required to be on all equipment and must be in proper working order before operations begin. If any of the devices are not in proper working order the equipment must be taken out of service and operations must not resume until the device is working properly again. The following is mandatory equipment:

- Crane level indicator
- Boom stops
- Jib stops
- Locks for foot pedal brakes
- Horns
- Integral check valves for hydraulic outriggers
- Rail clamps and stops for equipment on rails

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The following required equipment must be in service except where specified temporary alternative measures are met:

- Boom hoist limiting device
- Luffing jib limiting device
- Anti two-block device (cranes manufactured after 2/28/92) Exception: lattice booms used for dragline, clam shell, scrap magnet, drop ball, marine operations and pile driving work
- Boom angle or radius indicator
- Jib angle indicator (luffing jibs)
- Boom length indicator (telescopic booms)
- Load weighing devices (load moment indicators, rated capacity indicators or rated capacity limiters – cranes manufactured after 3/29/03)
- Outrigger position indicators (cranes manufactured after 1/1/08)
- Hoist drum rotation indicator (if drum is not visible to operator)

An accessible fire extinguisher of 5BC rating, or higher, shall be available at all operator stations or cabs of equipment.

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

If the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block and this marking shall be clearly legible from the ground floor.

Whenever internal combustion engine powered equipment exhausts in enclosed spaces, test shall be made and recorded to see that employees are not exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres.

Material Hoists, Personnel Hoists and Elevators

General Requirements

Hoist Specifications

All material hoists must conform to the requirements of ANSI/ASME A10.5-1969, Safety Requirements for Material Hoists. Note: ANSI/ASME have updated this standard; however, OSHA allows NCS to follow the updated consensus standard without penalty when it provides equal or greater employee protection.

NC Sturgeon must comply with the manufacturer's specifications and limitations for the operation of all hoists and elevators. Where manufacturer's specifications are not available, a professional engineer competent in the field must determine the limitations assigned to the equipment.

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Rated load capacities, recommended operating speeds, and special hazard warnings or instructions must be posted on cars and platforms.

Wire Rope

Hoisting ropes must be installed in accordance with the wire rope manufacturer's recommendations. Wire rope must be removed from service when any of the following conditions exists:

- In hoisting ropes, six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay
- Abrasion, scrubbing, flattening, or peening, causing loss of more than one-third of the original diameter of the outside wires
- Evidence of any heat damage resulting from a torch or any damage caused by contact with electrical wires
- Reduction from nominal diameter of more than three sixty-fourths in. for diameters up to and including three-fourths in.; one-sixteenth in. for diameters seven-eighths to 1 1/8 in.; and three thirty-seconds in. for diameters one and one-quarter in. to one and one-half in.

Prohibited Operations

The installation of live booms on hoists and the use of endless belt-type man lifts are prohibited.

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

Material Hoists

Operating rules must be established and posted at the operator's station of the hoist. Such rules must include signal system and allowable line speed for various loads. Rules and notices must be posted on the car frame or crosshead in a conspicuous location, including the statement "No Riders Allowed." No person must be allowed to ride on material hoists except for the purposes of inspection and maintenance.

Protective Gates, Bars, and Coverings

All entrances of the hoistways must be protected by substantial gates or bars, which must guard the full width of the landing entrance. All hoistway entrance bars and gates must be painted with diagonal contrasting colors, such as black and yellow stripes.

Bars must be not less than 2- by 4-in. wooden bars or the equivalent, located 2 ft. from the hoistway line. Bars must be located neither less than 36 in. nor more than 42 in. above the floor. Gates or bars protecting the entrances to hoistways must be equipped with a latching device.

Overhead protective covering of 2-in. planking, 3/4-inch plywood, or other solid material of equivalent strength must be provided on the top of every material hoist cage or platform.

The operator's station of a hoisting machine must be provided with overhead protection equivalent to tight planking not less than 2 in. thick. The support for the overhead protection must be of equal strength.

Hoist Towers

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All material hoist towers must be designed by a licensed professional engineer. Hoist towers may be used with or without an enclosure on all sides. Whichever alternative is chosen, the following applicable conditions must be met:

- When a hoist tower is enclosed, it must be enclosed on all sides for its entire height with a screen enclosure of 1/2-in. mesh, No. 18 U.S. gauge wire or equivalent, except for landing access.
- When a hoist tower is not enclosed, the hoist platform or car must be totally enclosed (caged) on all sides for the full height between the floor and the overhead protective covering with 1/2-in. mesh of No. 14 U.S. gauge wire or equivalent. The hoist platform enclosure must include the required gates for loading and unloading. A 6-ft-high enclosure must be provided on the unused sides of the hoist tower at ground level.

Car-arresting devices must be installed to function in case of rope failure.

Personnel Hoists

Specifications

All personnel hoists used by employees must be constructed of materials and components that meet the specifications for materials, construction, safety devices, assembly, and structural integrity as stated in the ANSI/ASME A10.4-1963, Safety Requirements for Workmen's Hoists. ANSI/ASME have updated this standard; however, OSHA allows NC Sturgeon to follow the updated consensus standard without penalty when it provides equal or greater employee protection.

Hoist Towers

Hoist towers outside the structure must be enclosed for the full height on the side or sides used for entrance and exit to the structure. At the lowest landing, the enclosure on the sides not used for exit or entrance to the structure must be enclosed to a height of at least 10 ft. Other sides of the tower adjacent to floors or scaffold platforms must be enclosed to a height of 10 ft. above the level of such floors or scaffolds. Towers inside of structures must be enclosed on all four sides throughout the full height. Towers must be anchored to the structure at intervals not exceeding 25 ft. In addition to tie-ins, a series of guys must be installed. Where tie-ins are not practical, the tower must be anchored by means of guys made of wire rope at least one-half in. in diameter, securely fastened to anchorage to ensure stability.

Hoistway Doors and Gates

Hoistway doors or gates must be not less than 6 ft. 6 in. high and must be provided with mechanical locks that cannot be operated from the landing side, and must be accessible only to persons on the car. A door or gate must be provided at each entrance to the car, which must protect the full width and height of the car entrance. Doors or gates must be provided with electrical contacts that do not allow movement of the hoist when door or gate is open.

Cars

Cars must be permanently enclosed on all sides and the top, except sides used for entrance and exit that have car gates or doors. Safeties must be capable of stopping and holding the car and rated load when traveling at governor tripping speed. Cars must be provided with a capacity and data plate secured in a conspicuous place on the car or crosshead. An emergency stop switch must be provided in the car and marked "Stop."

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Covering

Overhead protective covering of 2-in. planking, 3/4-in. plywood, or other solid material or equivalent strength must be provided on the top of every personnel hoist.

Engine Prohibition

Internal combustion engines must not be permitted for direct drive.

Stopping Device

Normal and final terminal stopping devices must be provided.

Ropes

The minimum number of hoisting ropes used must be three for traction hoists and two for drum-type hoists. The minimum diameter of hoisting and counterweight wire ropes must be 1/2 in. Following are the minimum safety factors for suspension wire ropes:

Rope speed (feet per minute)	Minimum factor of safety
50	7.60
75	7.75
100	7.95
125	8.10
150	8.25
600	10.70

See the chart at 29 CFR 1926.552(c)(14) for additional safety factors.

Personnel Hoists Used in Bridge Tower Construction

Such hoists must be approved by a registered professional engineer and erected under the supervision of a qualified engineer competent in this field.

When a hoist tower is not enclosed, the hoist platform or car must be totally enclosed (caged) on all sides for the full height between the floor and the overhead protective covering with 3/4-in. mesh of No. 14 U.S. gauge wire or equivalent. The hoist platform enclosure must include the required gates for loading and unloading.

These hoists must be inspected and maintained on a weekly basis. Whenever the hoisting equipment is exposed to winds exceeding 35 miles per hour, it must be inspected and put in operable condition before reuse.

Wire rope must be taken out of service when any of the following conditions exist:

- In running ropes, six randomly distributed broken wires in one lay or three broken wires in one strand in one lay
- Wear of one-third the original diameter of outside individual wires
- Kinking, crushing, bird caging, or any other damage resulting in distortion of the rope structure

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- Evidence of any heat damage from any cause
- Reductions from nominal diameter of more than three sixty-fourths in. for diameters to and including three-fourths in., one-sixteenth in. for diameters seven-eighths in. to 11/8 in. inclusive, three thirty-seconds in. for diameters 11/4 to 11/2 in. inclusive
- In standing ropes, more than two broken wires in one lay in sections beyond end connections or more than one broken wire at an end connection.

Elevators

Permanent elevators under the care and custody of NC Sturgeon and used by employees for work covered by this Act must comply with the requirements of ANSI/ASME A17.1-1965 with addenda A17.1a-1967, A17.1b-1968, A17.1c-1969, A17.1d-1970, and inspected in accordance with A17.2-1960 with addenda A17.2a-1965 and A17.2b-1967. ANSI/ASME have updated these standards; however, OSHA allows CSEI to follow the updated consensus standards without penalty when they provide equal or greater employee protection.

Base-Mounted Drum Hoists

Specifications

All base-mounted drum hoists in use must meet the applicable requirements for design, construction, installation, testing, inspection, maintenance, and operations, as prescribed by the manufacturer.

NC Sturgeon must ensure that exposed moving parts such as gears, projecting screws, setscrews, chain, cables, chain sprockets, and reciprocating or rotating parts that constitute a hazard are guarded.

All controls used during the normal operation cycle must be located within easy reach of the operator's station.

Electric Motor-Operated Hoists

Electric motor-operated hoists must be provided with:

- A device to disconnect all motors from the line upon power failure and not permit any motor to be restarted until the controller handle is brought to the "off" position
- Where applicable, an over-speed preventive device
- A means whereby remotely operated hoists stop when any control is ineffective

Overhead Hoists

All overhead hoists in use must meet the applicable requirements for construction, design, installation, testing, inspection, maintenance, and operation, as prescribed by the manufacturer.

The safe working load of the overhead hoist, as determined by the manufacturer, must be indicated on the hoist, and this safe working load must not be exceeded.

The supporting structure to which the hoist is attached must have a safe working load equal to that of the hoist. The support must be arranged so as to provide for free movement of the hoist and must not restrict the hoist from lining itself up with the load.

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The hoist must be installed only in locations that will permit the operator to stand clear of the load at all times.

Air hoists must be connected to an air supply of sufficient capacity and pressure to safely operate the hoist. All air hoses supplying air must be positively connected to prevent disconnected during use.

Conveyors

Specifications

All conveyors in use must meet the applicable requirements for design, construction, inspection, testing, maintenance, and operation, as prescribed in the ANSI/ASME B20.1-1957, Safety Code for Conveyors, Cableways, and Related Equipment. ANSI/ASME have updated this standard; however, OSHA allows NC Sturgeon to follow updated consensus standards without penalty when they provide equal or greater employee protection.

Means for stopping the motor or engine must be provided at the operator's station. Conveyor systems must be equipped with an audible warning signal to be sounded immediately before starting up the conveyor. If the operator's station is at a remote point, similar provisions for stopping the motor or engine must be provided at the motor or engine location.

Emergency stop switches must be arranged so that the conveyor cannot be started again until the actuating stop switch has been reset to running or "on" position.

Guards

Screw conveyors must be guarded to prevent employee contact with turning flights. Where a conveyor passes over work areas, aisles, or thoroughfares, suitable guards must be provided to protect employees required to work below the conveyors.

Marking and Lockout/Tagout

All crossovers, aisles, and passageways must be conspicuously marked by suitable signs (see 29 CFR 1926.200). Conveyors must be locked out, or otherwise rendered inoperable, and tagged out with a "Do Not Operate" tag during repairs and when operation is hazardous to employees performing maintenance work.

Rigging Practices

Major incidents involving rigging operations are caused by:

- the failure of equipment from overloading, incorrect assembly or disassembly, or lack of proper maintenance;
- dropped or falling loads, usually as a result of the misuse or malfunction of hoisting lines and rigging; and
- lack of safeguards, especially in proximity to high-voltage lines. Training is key in minimizing the risk of incidents

An important element of the NC Sturgeon material handling program is proper rigging practices. Rigging of loads must be done with relative precision and performed by trained, experienced personnel. To ensure that safe

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practices are followed, a competent and qualified person must direct the assembly/disassembly of equipment. The assembly/disassembly of equipment must be directed by a competent and qualified person to see that:

- Rigging equipment that has the necessary capacity to do the job is available.
- Rigging equipment is in a safe working condition.
- Loads are rigged correctly.
- Safety of the rigging crew and other potentially exposed personnel is maintained.

Rigging and Sling Inspections and Safety Requirements

- Only select rigging equipment that is in good condition.
- All rigging equipment shall be inspected annually; defective equipment is to be removed from service and destroyed to prevent inadvertent reuse.
- The load capacity limits shall be stamped or affixed to all rigging components.
- All devices shall be visually inspected prior to use and removed from service for any of the following conditions:
 - Nylon slings with:
 - Abnormal wear.
 - Torn stitching.
 - Broken or cut fibers.
 - Discoloration or deterioration.
 - Wire rope slings (see Wire Rope Inspection) with:
 - Kinking, crushing, bird caging, or other distortions.
 - Evidence of heat damage.
 - Cracks, deformation, or worn end attachments.
 - Six randomly broken wires in a single rope lay.
 - Three broken wires in one strand of rope.
 - Hooks opened more than 15% at the throat.
 - Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.
 - Alloy steel chain slings with:
 - Cracked, bent, or elongated links or components.
 - Cracked hooks.
 - Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

Rigging a Load

- Determine the weight of the load - do not guess.
- Determine the proper size for slings and components.
- Do not use manila rope for rigging.
- Ensure that shackle pins and shouldered eyebolts are installed in accordance with the manufacturer's recommendations.
- Ensure that ordinary (shoulderless) eyebolts are threaded in at least 1.5 times the bolt diameter.
- Use safety hoist rings (swivel eyes) as a preferred substitute for eye bolts wherever possible.

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

Inspections

Following assembly and erection of hoists, and before being put in service, an inspection and test of all functions and safety devices must be made under the supervision of a competent person.

A similar inspection and test are required following major alteration of an existing installation.

All hoists must be inspected and tested at not more than 3-month intervals. NC Sturgeon must prepare a certification record, which includes the date the inspection and test of all functions and safety devices was performed; the signature of the person who performed the inspection and test; and a serial number, or other identifier, for the hoist that was inspected and tested. The most recent certification record must be maintained on file.

Cranes shall be inspected on the following schedule:

- After Modification
- After Repair Or Adjustment
- Post Assembly
- Each Shift
- Monthly
- Annual Comprehensive

Additional inspections will occur for the following situations:

Severe Service

- Shock load, corrosive atmosphere, etc.
- Inspect exposed items/conditions
- Document

Not In Regular Use

- Idle more than three months
- Monthly inspection must be performed
- Document

Cranes and hoists that have been overloaded shall be inspected prior to being returned to service. The inspection and testing requirements are included.

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Initial inspection and test shall be performed by a qualified third party.

- Prior to initial use all new and altered cranes shall be inspected and tested to ensure compliance with the provisions of 29 CFR1910.179 and ABSI B30.2.
- Only after determining, by this inspection, testing and proper documentation, that the crane is in safe operating condition, shall it be put into service.

NC Sturgeon shall designate a competent person who shall inspect all machinery and equipment prior to each use, and during use, to make sure it is in safe operating condition. Any deficiencies shall be repaired, or defective parts replaced, before continued use. Daily pre-use inspections shall be performed by the crane operator (designated as NC Sturgeon's designated competent person) prior to beginning shift and through observation during normal operation. Daily inspections shall include:

- Any deficiencies shall be repaired, or defective parts replaced, before continued use.
- All functional operating mechanisms for maladjustment interfering with proper operation.
- Deterioration or leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems.
- Hooks, if deformations or cracks are found the hook shall be tagged out of service until repaired and tested by qualified personnel.
- Hoist chains, including end connections, for excessive wear, twist, distorted links interfering with proper function, or stretch beyond manufacturer's recommendations.

Severe Service Inspection

Severe service inspections shall be conducted to inspect exposed items and conditions resulting from a shock load, corrosive atmosphere, etc. Inspections shall be documented.

Not in Regular Use Inspection

If equipment is idle for more than three months a monthly inspection shall be performed before being placed in service. The same criteria for monthly inspections shall be followed.

Monthly Inspection

Monthly inspections of equipment by a competent person are documented. Equipment must be inspected monthly by a competent person and documented. Documentation must include the following:

- Items checked,
- Results of inspection, and
- Name and signature of the inspector.

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

If safety hazards are found during inspections, the equipment in question shall be tagged out and not used until repairs are made. Any deficiencies constituting a safety hazard shall cause the equipment to be tagged out of service until repairs are made.

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Annual Inspection

A thorough, annual inspection and functioning testing of the hoisting machinery shall be documented made by a qualified person, or by a government or private agency recognized by the U.S. Department of Labor using the detail inspection criteria per regulation. NC Sturgeon shall maintain a record of the dates and results of inspections for each hoisting machine and piece of equipment and kept on file for 12 months or until the next annual inspection.

Wire Rope Inspection

Wire rope will be inspected on the following schedule:

- Shift Inspection – Before each shift.
- Monthly Inspection - All wire ropes, including running ropes and the inspection shall be documented.
- Annual Inspection – At least every 12 months, unless not feasible due to set up. This will be a more detailed inspection including wire rope that is normally hidden during daily or monthly inspections and the inspection shall be documented.

A NC Sturgeon competent person will conduct visual inspections before each shift, monthly and annually for wire rope and categorize deficiencies in:

Category I Deficiencies

- Significant distortion of the wire rope structure such as kinking, crushing, un-stranding, bird caging, signs of core failure, or steel core protrusion between the outer strands.
- Significant corrosion.
- Electric arc (from a source other than power lines) or heat damage.
- Improperly applied end connections.
- Significantly corroded, cracked, bent, or worn end connections (such as from severe service).

If a Category I deficiency is identified, an immediate determination shall be made by the qualified person as to replacement of the wire rope, or if the deficiency is localized, the wire rope may be severed at the bad spot and may be continued to be used.

Category II Deficiencies

Visible broken wires as follows:

- In running wire ropes: six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay.
- In rotation resistant ropes: two randomly distributed broken wires in six rope diameters or four randomly distributed broken wires in 30 rope diameters.
- In pendants or standing wire rope more than two broken wires in one rope lay located in rope beyond end connections and / or one or more broken wire in a rope lay located at an end connection.

If a category II deficiency is identified an immediate determination shall be made by the qualified person as to, based on manufacturer recommendations, either remove or monitor the wire rope for continued deterioration.

The qualified person determines when to replace the wire rope (no more than 30 days after the deficiency is identified).

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A qualified person assesses the deficiency in light of the load and other conditions of use and determines it is safe for continued use.

A qualified person establishes the parameters of use.

All workers who conduct shift inspections are notified.

The qualified person's findings and procedures are documented.

Category III Deficiencies

- Electrical contact to power line
- Core protrusion or other distortion indicating core failure in rotation resistant wire rope
- Broken strand

If a category III deficiency is identified, operations involving use of the wire rope shall be prohibited until the:

- Wire rope is replaced (ALWAYS with power line contact).
- Deficiency is localized and problem corrected.

Operational Procedures

Only qualified personnel shall operate cranes and equipment covered by this program. Operators shall comply with the following safety rules while operating cranes and hoists:

- Employees shall not be exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres when internal combustion engine powered equipment is used. Tests shall be conducted and documented.
- Do not engage in any practice that will divert your attention while operating the crane.
- Respond to signals only from the person who is directing the lift or any appointed signal person.
- Obey a stop signal at all times, no matter who gives it.
- Do not move a load over people.
- People shall not be placed in jeopardy by being under a suspended load.
- Do not work under a suspended load unless the load is supported by blocks, jacks, or a solid footing that will safely support the entire weight.
- Have a crane or hoist operator remain at the controls or lock open and tag the main electrical disconnect switch.
- Ensure that the rated load capacity of a crane's bridge, individual hoist, or any sling or fitting is not exceeded.
- Know the weight of the object being lifted.
- Check that all controls are in the OFF position before closing the main line disconnect switch.
- If spring-loaded reels are provided to lift pendants clear off the work area, ease the pendant up into the stop to prevent damaging the wire.
- Avoid side pulls. These can cause the hoist rope to slip out of the drum groove, damaging the rope or destabilizing the crane or hoist.
- To prevent shock loading, avoid sudden stops or starts. Shock loading can occur when a suspended load is accelerated or decelerated, and can overload the crane or hoist. When completing an upward or downward motion, ease the load slowly to a stop.

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A visual inspection of the equipment will be conducted by a competent person prior to each shift. A competent person must conduct a visual inspection of equipment prior to each shift. The inspection must consist of observation for apparent deficiencies. Some of the inspection items include control mechanisms, pressurized lines, hooks and latches, wire rope, electrical apparatus, tires (when used), and ground conditions. The designated competent person operator shall do the following steps before making lifts with any crane or hoist:

- Test the upper-limit switch and slowly raise the unloaded hook block until the limit switch trips.
- Visually inspect the hook, load lines, trolley, and bridge as much as possible from the operator's station; in most instances, this will be the floor of the building.
- If provided, test the lower-limit switch.
- Test all direction and speed controls for both bridge and trolley travel.
- Test all bridge and trolley limit switches, where provided, if operation will bring the equipment in close proximity to the limit switches
- Test the pendant emergency stop.
- Test the hoist brake to verify there is no drift without a load.
- If provided, test the bridge movement alarm.
- Lock out and tag for repair any crane or hoist that fails any of the above tests.
- Any deficiencies shall be repaired, or defective parts replaced, before continued use.

Moving a Load

- Center the hook over the load to keep the cables from slipping out of the drum grooves and overlapping, and to prevent the load from swinging when it is lifted.
- Inspect the drum to verify that the cable is in the grooves.
- Use a tag line when loads must traverse long distances or must otherwise be controlled.
- Manila rope may be used for tag lines.
- Plan and check the travel path to avoid personnel and obstructions.
- Lift the load only high enough to clear the tallest obstruction in the travel path.
- Start and stop slowly.
- Land the load when the move is finished.
- Choose a safe landing area.
- Never leave suspended loads unattended
- In an emergency where the crane or hoist has become inoperative, if a load must be left suspended, barricade and post signs in the surrounding area, under the load, and on all four sides.
- Lock open and tag the crane or hoist's main electrical disconnect switch.

Parking a Crane or Hoist

- Remove all slings and accessories from the hook.
- Return the rigging device to the designated storage racks.
- Place the emergency stop switch (or push button) in the OFF position.

Cranes or hoists shall not be loaded beyond their rated capacity for normal operations.

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Any crane or hoist suspected of having been overloaded shall be removed from service by locking open and tagging the main disconnect switch. Overloaded cranes shall be inspected, repaired, load tested, and approved for use before being returned to service.

Fall Protection

Anyone conducting non-assembly/disassembly work, maintenance or repair on cranes or hoists at heights greater than 6 ft (1.8 m) shall use fall protection. Fall protection includes safety harnesses that are fitted with a lifeline and securely attached to a structural member of the crane or building. Anchorages must be any substantial part of the boom or to any substantial piece on the equipment (using correct fall protection equipment). A fall arrest system is permitted to be anchored to the crane/derrick's hook or other part of the load line where the following requirements are met:

- A qualified person has determined the set-up and rated capacity meets or exceeds the anchorage requirements
- The operator is aware it is being used for this purpose

Exceptions to using fall protection involving non-assembly/disassembly work:

- While at a work station or going to and from a work station.
- When walking point to point along a horizontal lattice boom that has been lowered to the ground and supported.
- In the cab or on the deck

Fall protection must be used when working over 15 feet during the assembly/disassembly process, except when the employee is:

- At or near the draw-works
- In the cab, or on the deck

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Signalling

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

- The point of operation is not in full view of the operator
- The view is obstructed when the equipment is traveling
- The operator or the person handling the load determines it is necessary due to site specific concerns.

Signals to the operator shall be in accordance with the standard hand signals prescribed by the applicable ANSI standard for the type of crane in use unless voice communications equipment (telephone, radio, or equivalent) is used.

- Signalers must be qualified.
- Signals shall be discernible or audible at all times.
- Some special operations may require addition to or modification of the basic signals.
- For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator, and shall not be in conflict with the standard signals.

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STANDARD HAND SIGNALS



STOP – With arm extended horizontally to the side, palm down, arm is swung back and forth.



EMERGENCY STOP – With both arms extended horizontally to the side, palms down, arms are swung back and forth.



HOIST – With upper arm extended to the side, forearm and index finger pointing straight up, hand and finger make small circles.



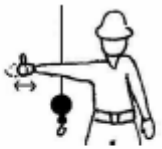
RAISE BOOM – With arm extended horizontally to the side, thumb points up with other fingers closed.



SWING – With arm extended horizontally, index finger points in direction that boom is to swing.



RETRACT TELESCOPING BOOM – With hands to the front at waist level, thumbs point at each other with other fingers closed.



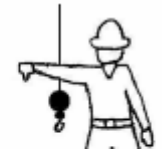
RAISE THE BOOM AND LOWER THE LOAD – With arm extended horizontally to the side and thumb pointing up, fingers open and close while load movement is desired.



DOG EVERYTHING – Hands held together at waist level.



LOWER – With arm and index finger pointing down, hand and finger make small circles.



LOWER BOOM – With arm extended horizontally to the side, thumb points down with other fingers closed.



EXTEND TELESCOPING BOOM – With hands to the front at waist level, thumbs point outward with other fingers closed.



TRAVEL/TOWER TRAVEL – With all fingers pointing up, arm is extended horizontally out and back to make a pushing motion in the direction of travel.

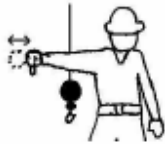
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LOWER THE BOOM AND RAISE THE LOAD – With arm extended horizontally to the side and thumb pointing down, fingers open and close while load movement is desired.



MOVE SLOWLY – A hand is placed in front of the hand that is giving the action signal.



USE AUXILIARY HOIST (whipline) – With arm bent at elbow and forearm vertical, elbow is tapped with other hand. Then regular signal is used to indicate desired action.



CRAWLER CRANE TRAVEL, BOTH TRACKS – Rotate fists around each other in front of body; direction of rotation away from body indicates travel forward; rotation towards body indicates travel backward.



USE MAIN HOIST – A hand taps on top of the head. Then regular signal is given to indicate desired action.



CRAWLER CRANE TRAVEL, ONE TRACK – Indicate track to be locked by raising fist on that side. Rotate other fist in front of body in direction that other track is to travel.



TROLLEY TRAVEL – With palm up, fingers closed and thumb pointing in direction of motion, hand is jerked horizontally in direction trolley is to travel.

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Training

Mandatory training is required for:

- Overhead power lines
- Signal persons
- Competent/qualified persons
- Operators
- Crush/pinch points
- Tag-out

Administrative Requirements

Training Costs

NC Sturgeon must provide all training required under the crane and derrick rules at no cost to the employee.

Refresher Training

NC Sturgeon must provide refresher training in relevant topics for each employee when there is an indication that retraining is necessary on the basis of NC Sturgeon actions or an evaluation of the employee's knowledge.

Training Evaluation

NC Sturgeon must evaluate each employee who has been trained in crane and derrick operations to verify that he or she understands the information provided in training. The rule allows NC Sturgeon to determine the most appropriate method of evaluation.

Note: The crane operator training applies only in states that do not have their own licensing and certification requirements. All other training and qualification requirements apply to all personnel.

CRANE OPERATOR TRAINING

NC Sturgeon must comply with federal requirements to train crane operators employed by them. During the certification phase-in period (i.e., November 2010 to November 2014) in states without operator licensing laws, NC Sturgeon must ensure that crane and derrick operators covered by the rules are competent to operate the equipment safely. Where an employee assigned to operate machinery does not have the required knowledge or ability to operate the equipment safely, NC Sturgeon must train that employee before operating the equipment. NC Sturgeon must ensure that each operator is evaluated to confirm that he or she understands the information provided in the training.

Operator-in-training requirement effective November 10, 2014

The rules for operator-in-training (e.g., prequalification/certification training, operator's trainer monitoring, multiple-lift rigging operations) in states without operator licensing rules are applicable on November 10, 2014. Until that date, operators must comply with the minimum training requirements required under the transition period from November 8, 2010 to November 10, 2014.

Minimum Training Requirements

Before operating crane equipment, each crane operator must be trained to know how to safely operate the specific type of equipment he or she will operate, including all of the following:

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- Safe practices for testing the boom hoist brake on friction equipment and all other equipment with a boom (see 29 CFR 1926.1430(c)(4)(i) for the specific safe practices);
- The manufacturer's emergency procedures for stopping unintended equipment movement, where available;
- The controls and operational/performance characteristics;
- Use of, and the ability to calculate (manually or with a calculator), load and capacity information on a variety of configurations of the equipment;
- Procedures to prevent and respond to power line contact;
- Technical knowledge similar to the subject matter criteria listed in Appendix C of the regulation applicable to the specific equipment (such as general technical information about wire ropes and rigging devices, site information, operations for carrying loads and multicrane lifts, and use of load charts);
- Technical knowledge applicable to the suitability of the supporting ground and surface to handle expected loads, to site hazards, and to site access;
- The applicable manuals, consensus standards, and other materials incorporated into the regulation.

The operator must be able to read and locate relevant information in the equipment manual and other materials containing information about the safe operation of equipment.

Operator Skills Demonstration

NC Sturgeon must ensure that the operator has demonstrated the skills necessary for safe operation of the equipment, including:

- The ability to recognize, from visual and auditory observation, the items listed in the regulation for shift inspection (29 CFR 1926.1412(d));
- Operational and maneuvering skills;
- Application of load chart information;
- Application of safe shutdown and securing procedures.

Overhead Power Line Training

In cases where crane equipment is expected to come closer to live power lines than the minimum clearance distance permitted under the rules for power line safety NC Sturgeon must train each crane operator and crew member assigned to work with equipment the procedures to be followed in the event of electrical contact with a power line. Such training must include:

- Information regarding the danger of electrocution from the operator simultaneously touching the equipment and the ground.
- The importance to the operator's safety of remaining inside the cab except where there is an imminent danger of fire, explosion, or other emergency that necessitates leaving the cab.
- The safest means of evacuating from equipment that may be energized.
- The danger of the potentially energized zone around the equipment (step potential).
- The need for crew in the area to avoid approaching or touching the equipment and the load.
- Safe clearance distance from power lines.
- Power lines are presumed to be energized unless the utility owner/operator confirms that the power line has been and continues to be deenergized and visibly grounded at the worksite.

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- Power lines are presumed to be uninsulated unless the utility owner/operator or a registered engineer who is a qualified person with respect to electrical power transmission and distribution confirms that a line is insulated.
- The limitations of an insulating link/device, proximity alarm, and range control (and similar) device, if used.
- The procedures to be followed to properly ground equipment and the limitations of grounding.

Employees working as dedicated spotters must be trained to enable them to effectively perform their task, including training on the applicable requirements of this section.

Tag Out and Start-up Procedures Training

Each operator must be trained in the tagout and start-up procedures specified in the rule for crane and derrick equipment that is out of service (see Operation rule at 29 CFR 1926.1417(f) and (g)).

Operators of Derricks, Sideboom Cranes and equipment with a maximum manufacturer-rated hoisting/lifting capacity of 2,000 lb. or less

Such operators are exempt from the detailed training requirements for other cranes. However, before operating such equipment, they must be trained in the safe operation of the type of equipment they will be operating.

ASSEMBLY/DISASSEMBLY (A/D) DIRECTOR

The A/D director is a person who supervises equipment assembly and disassembly operations and must understand the applicable A/D procedures.

The A/D director must meet the criteria for a competent and qualified person under the following conditions:

- Where the assembly and disassembly is performed by only one person, that person is considered the A/D director and must meet the training criteria for both a competent person and a qualified person;
- Where the A/D director is assisted by one or more qualified persons, he or she must meet the criteria for a competent person and is not required to be a qualified person.

AUTHORIZED PERSONNEL TRAINING

Each employee assigned to work on or near the equipment (i.e., authorized personnel) must be trained to:

- Recognize swing radius hazards;
- Recognize struck-by and pinch/crush hazard areas posed by the rotating superstructure;
- Keep clear of holes and crush/pinch points.

COMPETENT PERSON TRAINING

The competent person (i.e., 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) must be trained in any additional requirements of his or her role and responsibility under the new rules. For example, a competent person assigned to conduct a visual inspection of equipment during each shift the equipment is used must be trained in the required elements of a shift inspection.

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CREW MEMBER TRAINING

Assembly and Disassembly Operations

Before commencing assembly/disassembly operations, the A/D director must ensure that the crew members understand:

- Their tasks and the hazards associated with their tasks;
- The hazardous positions and locations that they need to avoid.

Work Near Power Lines

Crew members assigned to work with crane and derrick equipment must receive the same overhead power line training as required for crane operators, regardless of the distance from the power lines. See the Crane Operator Training subsection for more information.

DEDICATED SPOTTER

The dedicated spotter must meet the qualifications for a signal person and complete the training requirements for crew member.

The dedicated spotter's sole responsibility is to watch the separation between power lines and the crane or derrick equipment, load line and load (including rigging and lifting accessories) and ensure through communication with the operator that the applicable minimum approach distance is not breached.

MAINTENANCE AND REPAIR EMPLOYEE QUALIFICATIONS AND TRAINING

Maintenance and repair personnel must be trained to operate the equipment under limited conditions necessary to perform the maintenance or repair. The operation is limited to those functions necessary to perform maintenance, inspect the equipment or verify its performance. Such personnel may operate the equipment under the direct supervision of a qualified or certified crane operator, or if they are familiar with the operation, limitations, characteristics, and hazards associated with the type of equipment.

Qualified Person

A maintenance and repair employee must be a qualified person (i.e., a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project). Maintenance and repair workers are not considered "operators" and are therefore not required to be trained in all of the areas required for crane operators.

Tagout and Start-up Procedures Training

Each maintenance and repair person must be trained in tagout and start-up procedures specified in the rule (see Operation rule at 29 CFR 1926.1417(f) and 29 CFR 1926.1417(g)).

QUALIFIED PERSON

Qualified person is an employee by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project. Riggers and signalers are examples of personnel that must meet the requirements for qualified person.

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NC Sturgeon must train each qualified person regarding the requirements of the crane and derrick regulations applicable to their respective roles.

FALL PROTECTION TRAINING

NC Sturgeon must train each employee who may be exposed to fall hazards while on or hoisted by crane equipment on all of the fall protection requirements in the rule (29 CFR 1926.1423(a) to 1926.1423(j)), and the applicable criteria and practices in the fall protection rule for construction at 29 CFR 1926.502.

TRAINING RECAP TABLE

Personnel	Activity or Equipment	Training Requirement
All personnel	Work with cranes and derricks	Hazards and procedures to keep clear of holes and crush/pinch points
All personnel	Exposed to fall hazards while on or hoisted by equipment	Fall protection
All personnel on floating cranes/cranes on barges	Floating cranes/derricks and cranes/derricks on barges	Understand hazard warning signs and markings
Assembly/Disassembly (A/D) Director	Supervise assembly and disassembly operations	Meet criteria of a competent person and qualified person
Authorized personnel	Work in areas near rotating crane/derrick superstructure	How to recognize struck-by and pinch/crush hazards
Competent Person	All, including shift and monthly inspections	Applicable to respective role
Crew member	Assembly and disassembly operations	Understand tasks, hazards, positions/areas to avoid
Crew member	Work near power lines	Power line safety information and procedures
Dedicated Spotter	Work near power lines	Qualify as a signal person
Dedicated Spotter	Work near power lines	Power line safety information and procedures
Maintenance and Repair Personnel	Operate equipment	Qualify to operate
Maintenance and Repair Personnel	Equipment out of service	Tagout and start-up procedures
Operator	Derricks, sidebooms, small hoist/lift capacity cranes (2,000 lbs. or less) only	Know how to safely operate equipment (no specific training requirements)
Operator	Friction equipment	Test the boom hoist brake
Operator	Unintended equipment movement	Know manufacturer's emergency procedures
Operator	Operate specific type of crane (other than derricks, sidebooms, cranes of 2,000 lb or less capacity)	Know how to safely operate, inspect, calculate load, shut down, and secure
Operator	Work near power lines, and within minimum power line clearance	Power line safety and procedures in the event of electrical contact

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Personnel	Activity or Equipment	Training Requirement
Operator	Crane/Derrick equipment out of service	Tagout and start-up procedures
Qualified Person	All, including annual inspections	Applicable to respective role; possess a recognized degree, certificate, or professional standing, or have extensive knowledge, training, and experience.
Rigger	Assemble, rig, disassemble equipment and materials	Same as for qualified person
Signal Person	Communicate with operator of crane/derrick with greater than 2,000 lb. lift capacity	Qualify as a signal person with written or verbal test, retrain if needed
Signal Person	Communicate with operator of crane/derrick with lift capacity of 2,000 lb. or less	Proper use of signals applicable to the use of the equipment

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CRANES AND DERRICKS IN CONSTRUCTION
PRE-SHIFT INSPECTION BY A COMPETENT PERSON
29 CFR 1926.1412-1413

CRANE: _____ DATE: _____
 INSPECTOR: _____

Check the box next to each item after it has passed inspection. Note any deficiencies or other observations that could pose a risk of injury or property damage.

EQUIPMENT TYPE: _____ EQUIPMENT MODEL: _____

MANUFACTURER: _____ SERIAL NUMBER: _____

Circle One		Item or Function Inspected	Notes
Yes	No	Control mechanisms for maladjustments interfering with proper operation	
Yes	No	Control and drive mechanisms for apparent excessive wear of components and contamination by lubricants, water or other foreign matter	
Yes	No	Air, hydraulic, and other pressurized lines for deterioration or leakage, particularly those which flex in normal operation	
Yes	No	Hydraulic system for proper fluid level	
Yes	No	Hooks and latches for deformation, cracks, excessive wear, or damage such as from chemicals or heat	
Yes	No	Wire rope reeving for compliance with the manufacturer's specifications	
		Wire Rope Category I	
Yes	No	Significant distortion of the wire rope structure such as kinking, crushing, unstranding, birdcaging, signs of core failure or steel core protrusion between the outer strands	
Yes	No	Significant corrosion	
Yes	No	Electric arc damage (from a source other than power lines) or heat damage	
Yes	No	Improperly applied end connections	
Yes	No	Significantly corroded, cracked, bent, or worn end connections (such as from severe service).	
		Wire Rope Category II	
Yes	No	Visible broken wires, as follows:	
Yes	No	In running wire ropes: Six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay, where a rope lay is the length along the rope in which one strand makes a	

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Circle One		Item or Function Inspected	Notes
		complete revolution around the rope.	
Yes	No	In rotation resistant ropes: Two randomly distributed broken wires in six rope diameters or four randomly distributed broken wires in 30 rope diameters.	
Yes	No	In pendants or standing wire ropes: More than two broken wires in one rope lay located in rope beyond end connections and/or more than one broken wire in a rope lay located at an end connection	
Yes	No	A diameter reduction of more than 5% from nominal diameter.	
		Wire Rope Category III	
Yes	No	In rotation resistant wire rope, core protrusion or other distortion indicating core failure.	
Yes	No	Prior electrical contact with a power line.	
Yes	No	A broken strand.	
		Wire Rope Critical Review Items	
Yes	No	The competent person must give particular attention to all of the following:	
Yes	No	Rotation resistant wire rope in use	
Yes	No	Wire rope being used for boom hoists and luffing hoists, particularly at reverse bends.	
Yes	No	Wire rope at flange points, crossover points and repetitive pickup points on drums.	
Yes	No	Wire rope at or near terminal ends.	
Yes	No	Wire rope in contact with saddles, equalizer sheaves or other sheaves where rope travel is limited.	
Yes	No	Electrical apparatus for malfunctioning, signs of apparent excessive deterioration, dirt or moisture accumulation	
Yes	No	Tires (when in use) for proper inflation and condition	
Yes	No	Ground conditions around the equipment for proper support, including ground settling under and around outriggers/stabilizers and supporting foundations, ground water accumulation, or similar conditions	
Yes	No	The equipment for level position within the tolerances specified by the equipment manufacturer's recommendations, both before each shift and after each move and setup.	
Yes	No	Operator cab windows for significant cracks, breaks, or other deficiencies that would hamper the operator's view.	
Yes	No	Rails, rail stops, rail clamps and supporting surfaces when the equipment has rail traveling.	
Yes	No	Safety devices and operational aids for proper operation	

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SIGNATURE OF INSPECTOR _____ DATE _____

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Purpose

The purpose of this program is to establish a firm but fair disciplinary action policy to enforce the safety system.

Scope

This document is applicable to all employees.

Responsibilities

It is the responsibility of each and every person employed by NC Sturgeon to work in a safe and efficient manner. The safety system provides guidelines and procedures to help insure that safe work practices are observed. In the event that any employee violates provisions of the NC Sturgeon safety system or works in a manner that threatens his own health and safety or the health and safety of the employees around him, he will be subject to disciplinary action, up to and including termination of employment.

The safety manager, operations managers, supervisors and foremen are responsible for enforcing the safety system and for issuing disciplinary action as required by this section of the safety manual.

NC Sturgeon is committed to safety and senior management holds all supervisory staff responsible and accountable for safety within their respective areas.

Physical inspections by NC Sturgeon officials or insurance representatives that indicate violations showing overall lack of commitment to NC Sturgeon safety goals shall be under the same level of disciplinary actions.

Requirements

Safety is a core value and a condition of employment at NC Sturgeon. The following actions constitute a safety violation:

- Not following verbal or written safety procedures, guideline or rules of NC Sturgeon or our clients
- Horse play, failure to wear required PPE, and or abuse of PPE
- Being under the influence of drugs or alcohol during work
- Bringing weapons on the job site
- Failure to report incidents or injuries
- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.

Procedure

The following procedures will be following after issuing a safety violation notice:

- The first offense will result in a verbal warning. The employee is to be informed that he is being issued a verbal warning and informed why. Proper procedure will be discussed to clarify the situation and allow the employee to correct his behavior. The person making this verbal warning will inform the operations

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manager of his branch that this warning has been issued so the operations manager may make a written record of the warning.

- The second offense will result in a written reprimand and additional training. The reprimand will be written on the standard Safety Reprimand form (see below) and will describe the unsafe activity or behavior that needs correction. Refer to the section of the safety program that was violated (when applicable). The employee receiving the reprimand has the right to submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become a part of the employee's employment records.
- The third offense will result in another written reprimand (using the standard form) and punitive layoff, the duration of which will be decided at the time of the disciplinary action and is to be weighed by the severity of the offense. Again, the employee may submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become a part of the employee's employment records.
- The fourth offense may result in the termination of the offending employee.

The above actions are to be placed against a sliding twelve month scale. If an employee receives a reprimand on January 1 and commits his fourth offense on or before December 31st of the same year, he is terminated. The employee does not have to commit the same violation each time to receive further reprimands. He could receive a verbal reprimand for smoking in a no smoking area on his first offense and get a written reprimand for his second offense which might be a forklift violation and yet another for failing to use proper personal protective equipment. He will be terminated upon his fourth offense in the last twelve months.

In the case of serious safety violations such as by-passing guarding or other unsafe activities that put the violator or other employees at serious risk of injury, the manager may move the violator directly to the second or third warning level. If the violator's actions put him or others at risk of death or dismemberment the manager has the option to terminate him with no further warning.

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Safety Reprimand Form

Date: _____ Reprimand # _____

Issued To: _____

Signature: _____

Issued By: _____

Signature: _____

Violation (Describe in Detail):

Follow up Training: _____

Presented by: _____

Date of Training: _____

Trainee Signature: _____

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Purpose

The purpose of the Electrical Safety program is to set forth procedures for the safe use of electrical equipment, tools, and appliances at NC Sturgeon.

Scope

This program applies to all NC Sturgeon. employees, temporary employees, and contractors. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers NC Sturgeon. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected Personnel - Personnel who normally use and work with electrical equipment, tools, and appliances, but who do not make repairs or perform lock out/tag out procedures.

Appliances - Electrical devices not normally associated with commercial or industrial equipment such as air conditioners, computers, printers, copiers, coffee pots, microwave ovens, toasters, etc.

Circuit Breaker - A device designed to open and close a circuit by non-automatic means and to open the circuit automatically on a predetermined over current without injury to itself when properly applied within its rating.

Disconnecting Means - A device, or group of devices, or other means by which the conductors of a circuit can be disconnected from their source of supply.

Disconnecting Switch - A mechanical switching device used for isolating a circuit or equipment from a source of power.

Double Insulated Tool - Tools designed of non-conductive materials that do not require a grounded, three wire plug.

Ground - Connected to earth or some conducting body that serves in place of the earth.

Grounded Conductor - A conductor used to connect equipment or the grounded circuit of a wiring system to a grounding electrode or electrodes.

Ground Fault Circuit Interrupter (GFCI) - A device whose function is to interrupt the electric circuit to the load when a fault current to ground exceeds some predetermined value that is less than that required to operate the over current protective device of the supply circuit. *NC Sturgeon shall use GFCIs in lieu of an assured grounding program.*

Insulated - A conductor encased within material of composition and thickness that is recognized as electrical insulation.

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Premises Wiring - That interior and exterior wiring, including power, lighting, control, and signal circuit wiring together with all of its associated hardware, fittings, and wiring devices, both permanently and temporarily installed, which extends from the load end of the service drop, or load end of the service lateral conductors to the outlet (s). Such wiring does not include wiring internal to appliances, fixtures, motors, controllers, motor control centers, and similar equipment.

Qualified Person - One that has been trained in the repair, construction and operation of electrical equipment and the hazards involved.

Strain Relief - A mechanical device that prevents force from being transmitted to the connections or terminals of a cable or extension cord.

Class I Locations - Are those in which flammable gases or vapors are or may be present in the air in quantities sufficient to produce explosive or ignitable mixtures.

Class 1 Division 1 - Is a location (a) in which hazardous concentrations of flammable gases or vapors may exist under normal operating conditions; or (b) in which hazardous concentrations of such gases or vapors may exist frequently because of repairs or maintenance operations or because of leakage; or (c) in which a breakdown or faulty operation or equipment or processes might release hazardous concentrations of flammable gases or vapors, and might also cause simultaneous failure of electrical equipment.

Class 1 Division 2 - Is a location (a) in which volatile flammable liquids or flammable gases are handled, processed, or used, but in which the hazardous liquid, vapors, or gases will normally be confined within closed containers or closed systems from which they can escape only in case of accidental rupture or breakdown of such containers or systems, or in of abnormal operation of equipment or (b) in which hazardous concentrations of gases or vapors are normally prevented by positive mechanical ventilation, and which might become hazardous through failure or abnormal operations of the ventilating equipment; or (c) that is adjacent to a Class 1, Division 1 location, and to which hazardous concentrations of gases or vapors might occasionally be communicated unless such communication is prevented by adequate positive-pressure ventilation from a source of clean air, and effective safeguards against ventilation failure are provided.

Class II locations - Class II locations are those that are hazardous because of the presence of combustible dust. Class II locations include the following:

Class II, Division 1 - A Class II, Division 1 location is a location (a) in which combustible dust is or may be in suspension in the air under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures; or (b) where mechanical failure or abnormal operation of machinery or equipment might cause such explosive or ignitable mixtures to be produced, and might also provide a source of ignition through simultaneous failure of electric equipment, operation of protection devices, or from other causes, or (c) in which combustible dusts of an electrically conductive nature may be present.

NOTE: This classification may include areas of, areas where metal dusts and powders are produced or processed, and other similar locations that contain dust producing machinery and equipment (except where the equipment is dust-tight or vented to the outside).

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- These areas would have combustible dust in the air, under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures.
- Combustible dusts that are electrically nonconductive include dusts produced in the handling and processing produce combustible dusts when processed or handled.
- Dusts containing magnesium or aluminum are particularly hazardous and the use of extreme caution is necessary to avoid ignition and explosion.

Class II, Division 2 - A Class II, Division 2 location is a location in which: (a) combustible dust will not normally be in suspension in the air in quantities sufficient to produce explosive or ignitable mixtures, and dust accumulations are normally insufficient to interfere with the normal operation of electrical equipment or other apparatus; or (b) dust may be in suspension in the air as a result of infrequent malfunctioning of handling or processing equipment, and dust accumulations resulting there from may be ignitable by abnormal operation or failure of electrical equipment or other apparatus.

NOTE: This classification includes locations where dangerous concentrations of suspended dust would not be likely but where dust accumulations might form on or in the vicinity of electric equipment. These areas may contain equipment from which appreciable quantities of dust would escape under abnormal operating conditions or be adjacent to a Class II Division 1 location, as described above, into which an explosive or ignitable concentration of dust may be put into suspension under abnormal operating conditions.

Responsibilities

Managers/Supervisor

The HSE Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees shall be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

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Safe Work Practices

Inspections

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.
- Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

Repairs

- Only Qualified Personnel, who have been authorized by the department supervisor or manager, may make repairs to supply cords on electrical tools and to extension cords.
- The names of employees authorized to make repairs will be posted in the workplace.
- Only certified electricians shall be allowed to make repairs to electrical equipment and wiring systems.
- The supervisor obtaining the services of a certified electrician is responsible to verify the electrician's credentials.
- Employees shall not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.
- Employees shall not wear conductive apparel such as rings, watches, jewellery, etc. (unless they are rendered non-conductive by covering, wrapping, or other insulating means) while working on or near open energized equipment this includes batteries on trucks, forklifts, phone backup systems or other such equipment.
- If employees are subject to handle long dimensional conductor objects (ducts or pipes), steps for safe work practices shall be employed to ensure the safety of workers.

Extension Cords

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - All extension cords shall be plugged into one of the following:

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- A GFCI outlet;
 - A GFCI built into the cord;
 - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be remove from service and repaired or replaced.
 - Extension cords shall not be used on compressor skid to operated heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment shall be hard wired per applicable electrical codes.

Outlets

- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

Multiple Outlet Boxes

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

Double Insulated Tools

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

Switches, circuit breakers, and disconnects

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labelled with the voltage rating.
- Each breaker within a breaker panel must be labelled for the service it provides.
- Disconnect switches providing power for individual equipment must be labelled accordingly.

Ladders

- Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of, fiberglass, or have non-conductive side rails.
- When using ladders they shall be free from any moisture, oils, and greases.

Energized and Overhead High Voltage Power Lines & Equipment

- A minimum clearance of 10 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines shall be de-energized and grounded or other protective measures shall be provided before work is started.
- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.

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- Minimum approach distance for qualified employees shall be followed per 29 CFR 1910.333(c)(3)(i) Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current).

Confined or Enclosed Work Spaces

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee shall isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

Enclosures, Breaker Panels, and Distribution Rooms

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures shall be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have “Danger: High Voltage – Authorized Personnel Only” posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

Lock Out/Tag Out

- No work shall be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with the live parts) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been de-energized, the circuits energizing the parts shall be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out shall be treated as live parts.
- Per NC Sturgeon policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using NC Sturgeon’s Control of Hazardous Energy – Lock Out/Tag Out Program. Lockouts are performed by the employee doing the job. If live sources are to be worked it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.
- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow NC Sturgeon’s Control of Hazardous Energy – Lock out/Tag Out Program.
- Authorized personnel will be trained in lock out/tag out procedures.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

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Contractors

- Only approved, certified, electrical contractors may perform construction and service work on NC Sturgeon or client property.
- It is the Manager/Supervisors responsibility to verify the contractor's certification.

Fire Extinguishers

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

Electric Shock-CPR:

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

Electric Welders

- A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.
- A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

Equipment Grounding

- All gas compressors, air compressors, separators, vessels, etc. shall be grounded by means of using a lug and ground strap, nominal in size to a ½" bolt or larger, attached to a ground rod six feet or longer.
- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

Assured Grounding

OSHA requires that employers shall use either ground fault circuit interrupters (GFCI) or an assured equipment grounding conductor program to protect personnel from electrical shock while working.

- EGI shall use GFCI's in lieu of an assured grounding program.

Ground Fault Circuit Interrupters

All 120-volt, single-phase 15 and 20 ampere receptacle outlets on construction or maintenance sites, which are not part of the permanent wiring of the building or structure and which are in use by employees, shall have approved ground fault circuit interrupters for personnel protection.

- All hand portable electric tools and extension cords shall use a GFCI.

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- Additionally, approved GFCI's shall be used for 240-Volt circuits in the same service as described above.
- GFCI's must be used on all 120 volt, single-phase 15 amp and 20 amp receptacles within 6 feet of a sink, damp areas or on installed outdoor equipment.
- The GFCI must be the first device plugged into a permanent receptacle.
- The GFCI must be tested before each use.

Training

All regular full time and temporary employees will be trained in Electrical Safety utilizing the NC Sturgeon Electrical Safety Training course or an approved equivalent.

Employees who face a risk of electric shock, but who are not qualified persons, shall be trained and familiar with electrically related safety practices.

Employee shall be trained in safety related work practices that pertain to their respective job assignments.

Employees shall be trained on clearance distances.

Safe work practices shall be employed to prevent electric shock or other injuries resulting for either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

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Purpose

To ensure our employees recognize to effect of fatigue as related to safely being able to perform work and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations.

Scope

This program applies to all NC Sturgeon projects and operations.

Policy

The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:

- Employees must be in a fit state to undertake work
- Employees must be fit to complete work
- Employees must take minimum periods of rest to safely perform their work

These principles will be managed through:

- The appropriate planning of work tasks, including driving, vehicle and equipment maintenance, loading and unloading and other job related duties and processes
- Providing appropriate equipment to help reduce stress and fatigue
- Regular medical checkups and monitoring of health issues as required by legislation
- The provision of appropriate sleeping accommodations where required
- Ongoing training and awareness of employee health and fatigue issues

Key Responsibilities

NC Sturgeon Management

- Management accepts responsibility for the implementation of this fatigue management policy.

Site Manager

- Responsible for the implementation and maintenance of this program for their site and ensuring all assets are made available for compliance with the program.

Employees

- Employees must present in a fit state free from alcohol and drugs;
- Employees must not chronically use over-the-counter or prescription drugs to increase mental alertness.
- Employees are prohibited from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off.
- Workers shall report tiredness/fatigue to supervision and supervisors shall take appropriate action to assist the worker.

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- Employees must report fatigue/tiredness and lack of mental acuity to supervision. Supervision must take appropriate actions to prevent loss.
- Employees need to be rested prior to starting work.
- Employees need to monitor their own performance and take regular periods of rest to avoid continuing work when tired.

Work Hour Limitations

NC Sturgeon has set the following work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and to increase mental fitness.

1. Every Employee shall have necessary work breaks in order to avoid fatigue. These scheduled breaks will apply to both driving and on site hours. The following shall be a minimum:
 - 15 Minutes each 3 hours
 - 30 Minutes after 6 Hours
 - 30 Minutes after 10 Hours
2. No Workers shall work more than:
 - 12 hours per day
 - 24 Days Continuous
3. Unfamiliar or irregular work should be avoided.

Equipment and Evaluation

NC Sturgeon will provide equipment such as anti-fatigue mats for standing, lift assist devices for repetitive lifting and other ergonomic devices as deemed appropriate, chairs for workers to sit periodically and will provide periodic rest breaks for personnel. NC Sturgeon will also periodically evaluate and improve work tasks to control fatigue.

Training

NC Sturgeon is committed to ensuring that all employees are competent to perform their tasks including:

- Fatigue management and health issues.
- NC Sturgeon will provide initial and annual training on how to recognize fatigue, how to control fatigue through appropriate work and personal habits and reporting of fatigue to supervision.

A record of individual fatigues training and competency will be maintained.

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Purpose

NC Sturgeon full and part-time staff are expected to report for work fit for duty, which means able to perform their job duties in a safe, appropriate and an effective manner free from the adverse effects of physical, mental, emotional and personal problems.

Scope

This program applies to all **NC Sturgeon** projects and operations.

Requirements

It is the goal of **NC Sturgeon** to provide a safe workplace for all employees. To accomplish this goal we have adopted the following fitness for duty policy requirements.

Pre-Employment Testing

Employees are physically capable of performing their job function. Pre-employment physicals should be included in the hiring process, and also when changing into certain job functions and different environments.

Training and Safe Work Requirements

Employees are properly trained for their assigned tasks. Employees must receive training specific to their assigned task. Examples might be welding, instrumentation, scaffold building, equipment operator qualifications, etc. based on a training matrix that reflects the job description and/or tasks being performed. All training is to be documented.

Safe work practices and procedures must be followed. Safe work procedures must be in place prior to work beginning. Employees shall follow our and our client's safety requirements. Examples may include, hot work permitting, confined space, lockout tagout, process safety management, electrical safety, operator safety and other standard work practices, safety rules or procedures.

Personal Medical Reporting Requirements

Employees must report all medications they are taking that could impair their ability to work safely. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor. The reporting must occur before the employee arrives for work or arranges for transportation to a remote site.

Client Drug and Alcohol Testing Requirements

Drug and alcohol testing for pre-employment, post-accident or random as prescribed by the host facility shall be implemented. Procedures must include and be implemented for drug and alcohol testing as prescribed by DOT or the host client facilities.

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Employee Activity and Behavior

We will monitor employee activities and behaviors to determine if employees should be removed from the work site. Employee's activities and behaviors will be monitored to determine if employee should be removed from the work site if their ability to perform their duties safely is questioned.

Fit for Duty Examination

Confidentiality

Medical Records and other related records are protected by state and federal confidentiality laws and **NC Sturgeon** policy. The medical record of fitness for duty examination will be maintained in the Human Resources office. Employee medical records will not be released to unauthorized personnel without the employee's written consent or subpoena in accordance with state and federal laws.

Self-Referrals

Employees are responsible for notifying their supervisor if they are fatigued to the point of not being able to perform their duties safely. Employees must be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers.

Disciplinary action may occur for an employee not reporting to work in a condition which could endanger their safety or the safety of any other person(s). See below for Management Referral in case there is a question of the employee's ability to work safely.

Management Referral

Management Personnel Responsibility

Management personnel are responsible for monitoring the attendance, performance and behavior of their employees. When an employee's performance and/or behavior (including the odor of alcohol or possible use of any illegal substance) appears to be unsafe, ineffective and/or inappropriate, it is every manager's responsibility to challenge the employee's behavior and the ability to function, remove the employee from the job, refer the employee for a Fitness for Duty exam immediately and conduct appropriate follow up.

Due to the safety issues involved, supervisors have a special responsibility to implement this policy in a consistent and fair manner.

Procedure

- When any manager or their designee observes an employee who is not performing his/her job safely, appropriately, and effectively, or an odor of alcohol is present, or whose behavior is inappropriate, that manager is to remove the employee from her/his duty immediately and call Human Resources to continue the Fitness for Duty procedure. The employee will be referred to a medical provider for a fitness for duty exam.
- The Fitness for duty evaluation may include testing for chemical (e.g. alcohol and drug) levels, referral for psychiatric evaluation or any other evaluation or follow-up deemed necessary.
- The manager or designee must document the reasons for the fitness for duty request by recording the employee's behavior and noting the names of any witnesses who observed that behavior. Documentation must be submitted to Human Resources by the next business day.

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- The employee is required to cooperate fully with the manager and medical personnel. The employee must sign consent forms for both the fitness examination and communication of its results in confidence to Human Resources. Refusal to cooperate will be considered insubordination and will be grounds for disciplinary action. The employee should be suspended pending investigation, which could result in termination.
- Medical personnel will advise Human Resources if the employee is fit or not fit for duty. The medical results of the fitness for duty exam will be communicated to Human Resources.
- If medical personnel determine that the employee is FIT FOR DUTY, the employee must contact Human Resources on the next general business day and the manager in consultation with Human Resources will determine discipline in situations where misconduct may have occurred.
- If medical personnel determine that the employee is NOT FIT FOR DUTY:
 - The manager makes every effort to arrange for safe transportation home for the employee.
 - The employee must contact Human Resources, on the next general business day.
 - The manager, in consultation with Human Resources, will determine discipline in situations where misconduct has occurred.

Subsequent Fitness for Duty Exams

Dependent upon the reason for the fitness exam, employees who violate this policy a second time may be subject to progressive discipline, up to and including termination of employment.

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Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of **NC Sturgeon** facilities as related to the indicated general safety requirements that apply.

This program applies to all employees of **NC Sturgeon**, temporary employees and any contractors working for **NC Sturgeon**. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

NC Sturgeon Safety Manager

- The designated Safety Manager is responsible for developing and maintaining the General Safety Requirements program. These procedures are kept in the designated safety manager's office.

Site Manager

- Responsible for the implementation and maintenance of the plan for their site and ensuring all assets are made available for compliance with the plan.

Employees

- All shall be familiar with this procedure and the local workplace General Safety Requirements program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.
- Shall use the safeguards, safety appliances and personal protective equipment while following all safe work practices and procedures for the workplace.

Competency and Training

Workers shall be competent to operate equipment and perform job tasks. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision. Work that may endanger a worker must be completed by a worker who is competent to do the work or by a worker who is working under the direct supervision of a worker who is competent to do the work. All workers must be trained in procedures until they are competent. **NC Sturgeon** shall permit only qualified by training or experience workers to operate equipment and machinery.

Training must include: procedures to be taken in the event of a fire or other emergency, the location of first aid facilities, identification of prohibited or restricted areas, precautions to be taken for the protection of the worker from physical, chemical or biological hazards, any procedures, plans, policies and programs that **NC Sturgeon** is required to develop and any other matters that are necessary to ensure the health and safety of the worker while the worker is at work.

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NC Sturgeon shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

Inspections

NC Sturgeon shall ensure that frequent and regular inspections of the workplace, jobsites, materials, equipment and of work processes and procedures by a competent person to identify any risk to the safety or health of any person at the workplace.

NC Sturgeon shall ensure that every dangerous occurrence is investigated as soon as is reasonably possible.

NC Sturgeon must ensure that if a risk is identified we will correct any unsafe condition as soon as is reasonably practicable and, in the interim, take immediate steps to protect the safety and health of any person who may be at risk.

General Facility Requirements

Housekeeping

Each work site shall be kept clean and free from materials or equipment that could cause workers to slip or trip. A floor or other surface used by any worker shall be kept free of obstructions, hazards and accumulations of refuse, snow or ice.

NC Sturgeon requires that a worksite is sanitary and kept as clean as is reasonably practicable.

A reasonable supply of potable drinking water shall be kept readily accessible at a project for the use of workers.

Safe Equipment Maintenance

NC Sturgeon has a duty to ensure our work site maintenance, systems of work and working environments ensure, as far as is reasonably practicable, the health, safety and welfare at work of the our workers.

We must and shall ensure that all equipment is maintained at intervals that are sufficient to ensure the safe functioning of the equipment. All equipment is to be maintained, safe to perform, adequate strength for its purpose and free from obvious defects. Damaged and faulty equipment reporting procedures must be in place.

Where a defect is found in equipment **NC Sturgeon** will ensure that steps are taken immediately to protect the health and safety of any worker who may be at risk until the defect is corrected and the defect is corrected by a competent person as soon as is reasonably practicable.

Any machinery, tool, material, or equipment which is not in compliance with any applicable OSHA requirement is prohibited. The machine, tool, material or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

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Any worker who knows or has reason to believe that equipment under the workers control is not in a safe condition shall immediately report the condition of the equipment to COMPANY and repair the equipment if the worker is authorized and competent to do so.

NC Sturgeon prohibits and will not require or permit compressed air to be directed towards a worker for the purpose of cleaning clothing or personal protective equipment used by that worker, or for any other purpose if the use of compressed air may cause dispersion into the air of contaminants that may be harmful to workers.

Whenever workers are present at a worksite COMPANY will provide lighting that is sufficient to protect the health and safety of workers and suitable for the work to be done at the worksite.

No worker is allowed to smoke in an enclosed place of employment, worksite or work-related area except in an area designated for smoking.

Impairment

No person shall enter or remain at any workplace of employment while the person's behaviour or ability to work is affected by alcohol, intoxicating beverages, drugs or other substance so as to create a nuisance or if his or her abilities are impaired so as to endanger any person, or to create an undue risk to workers, endanger the person or anyone else.

Improper Conduct

All workers shall engage in proper activity or behaviour. Improper behaviour that might create or constitute a hazard to any person is not acceptable. Improper activity or behaviour includes horseplay, scuffling, fighting, practical jokes, and unnecessary running or jumping.

Industrial Hygiene

Where a worker is exposed to a potential hazard of injury to the eye due to contact with a biological or chemical substance, an eyewash fountain shall be provided.

A worker who may be exposed to a biological, chemical or physical agent that may endanger the worker's safety or health shall be trained to use the precautions and procedures to be followed in the handling, use and storage of the agent, in the proper use and care of required personal protective equipment, and in the proper use of emergency measures and procedures.

No food, drink or tobacco shall be taken into, left or consumed in any room, area or place where any substance that is poisonous by ingestion is exposed.

Protective clothing or other safety device that has been worn next to the skin shall be cleaned and disinfected prior to being worn by another worker.

Workers who handle or use corrosive, poisonous or other substances likely to endanger their health shall be provided with washing facilities with clean water, soap and individual towels.

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Thermal Stress

A worker must not be exposed to levels that exceed those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. Clothing corrections must be applied in accordance with the heat stress and strain section of the ACGIH Standard.

If a worker is or may be exposed **NC Sturgeon** must conduct a heat stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable to the local provincial or territorial agency and develop and implement a heat stress exposure control plan.

If a worker is or may be exposed **NC Sturgeon** must implement engineering controls to reduce the exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. If the above action is not practicable, the employer must reduce the exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard by providing; administrative controls, including a work-rest cycle, or personal protective equipment, if the equipment provides protection equally effective as administrative controls.

If a worker is or may be exposed, the employer must provide and maintain an adequate supply of cool potable water close to the work area for the use of a heat exposed worker.

If a worker shows signs or reports symptoms of heat stress or strain, the worker must be removed from the hot environment and treated by an appropriate first aid attendant, if available, or by a physician.

If a worker is or may be exposed to the conditions specified below **COMPANY** the employer must conduct a cold stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable and develop and implement a cold exposure control plan.

- Thermal conditions that could cause cold stress or injury,
- Thermal conditions that could cause a worker's core body temperature to fall below 36°C (96.8°F), or
- Thermal conditions that are below the levels classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard.

If a worker is or may be exposed **NC Sturgeon** must implement effective engineering controls to reduce the exposure hazard to levels above those classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard. If the above action is not practicable **COMPANY** must reduce the exposure hazard by providing effective administrative controls or personal protective equipment if the equipment provides protection equally effective as administrative controls.

A worker who is or may be exposed must wear adequate insulating clothing and personal protective equipment. If work takes place outdoors in snow or ice covered terrain where excessive ultraviolet light, glare or blowing ice crystals present a risk of injury to the eyes workers must wear eye protection appropriate to the hazards.

If a worker exposed to cold shows signs or reports symptoms of cold stress or injury the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician.

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Purpose

The purpose of this waste management strategy was developed to provide guidance and requirements necessary for efficient, effective and compliant waste management during construction and operations.

Scope

This procedure applies to all NC Sturgeon employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers NC Sturgeon employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Procedure

The NC Sturgeon Safety Manager or other designated person in his or her absence is assigned the responsibility for proper waste or scrap materials.

Waste Estimation

Each work site will estimate the waste that will be generated prior to work being performed so the need for containers and waste removal, if necessary, can be determined.

Each site will utilize the following for planning of dumpster scheduling and total non-hazardous dry waste material. These figures do not include neither recycling nor waste minimization efforts and reflect no use of an incinerator. Dumpster figures are based on a 40 yard container and can be modified if another size is used by changing the table below.

SAMPLE ONLY - SOLID WASTE						
	Number of Employees	10	25	35	50	100
<u>Total Estimated Square Feet of Waste</u> (@ 0.675 cu ft per person daily)						
	Daily	7	17	24	34	68
	Weekly	47	118	165	236	473
	Monthly (4.33 wks)	205	511	716	1,023	2,046
	Annual	2,455	6,138	8,593	12,276	24,551
<u>Total Estimated Weight of Waste</u> (@ 4lb per person daily)						
	Daily	40	100	140	200	400
	Weekly	280	700	980	1,400	2,800
	Monthly (4.33 wks)	1,212	3,031	4,243	6,062	12,124
	Annual	14,549	36,372	50,921	72,744	145,488
<u>Number of Total Dumpster Fills</u> 40 yard dumpster 7x8x22 = 1,232 square feet						
	Daily	0.0	0.0	0.0	0.0	0.1
	Weekly	0.0	0.1	0.1	0.2	0.4
	Monthly (4.33 wks)	0.2	0.4	0.6	0.8	1.7
	Annual	2.0	5.0	7.0	10.0	19.9

NC Sturgeon must coordinate with the project site or owner to ensure proper disposal of wastes or scrap materials.

NC Sturgeon must ensure the owner client is aware of whether wastes and scrap materials will be taken off site by NC Sturgeon or will be disposed of on the owner client's site.

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Waste Segregation

- Do not mix waste streams
- Only place waste in the designated container, satellite accumulation area (SAA), recyclable accumulation area (RSS), universal waste accumulation area (UWAA) or designated dumpster.

Recycling

The collection of recycled material will reduce the total load on the environment. Bins of sufficient size must be lined with a plastic bag and clearly labeled for use. Posters from NC Sturgeon will be posted throughout the work site to encourage recycling. Collection bins will also be placed in administrative areas will follow the following color guiding:

- Blue - Paper
- Green - Aluminum cans
- Yellow - Plastic

Cardboard will be flattened, staples and excess shipping tape removed. No cardboard shall be placed in the dumpster used for the landfill.

Waste Handling Matrix

Each work site will develop a Waste Handling Matrix (sample shown) that will:

- Address safe practices related to the immediate storage and handling of waste, scrap or leftover material.
- The handling, organization and storage of waste and scrap materials to minimize potential impact to the environment. Waste materials shall be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities receptacles must b4e covered to prevent dispersion of waste materials and to control the potential for runoff.

Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Aerosol Can Contents	Equipment Repair Shop	Puncturing of aerosol cans	Hazardous	SAA is self-contained in the equipment repair shop	Ship to assigned site for recycling or disposal	Read warnings before use of Aerosolv unit.
Aerosol Can Puncturing Unit Filter	Equipment Repair Shop	Filter Changes	Hazardous	Place in designated labeled container	Ship to assigned site for recycling or disposal	Change filter every 3 months
Aerosol Cans	Various Locations	Painting, lubricants, cleaning	Non-Hazardous if aerosol can is punctured and drained	Place punctured aerosol can in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster from client.	See "Scrap Metal" for waste stream management
Ash	Smart Ash Unit	Incineration of acceptable waste	Non Hazardous	Dispose of Immediately	Place in the Burnable Waste Dumpster	Gloves Goggles

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Automotive and Heavy Equipment Parts-Used	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	RAA's by equipment repair shop	Returned to vendors for recycling	Starters, Alternators, Pumps, Transmissions
Batteries (Alkaline)	Various Locations	Battery Failures	Universal Waste	Place in the UWAA in the equipment repair shop	"D" cell and below are acceptable in the Non-Burnable Waste Dumpster	Ship to designated site for recycling or disposal
Batteries (Lead Acid)	Equipment Repair Shop and Fab Shop	Battery Failures	Universal Waste	No storage allowed. Containment boxes are labeled and available in the shops.	Lead acid batteries are returned to the Vendor upon removal	Ship to designated site for recycling
Batteries (Nicad)	Various Locations	Battery Failures	Universal Waste	UWAA in the equipment repair shop.	Ship to assigned site for recycling or disposal	Cell phones, radios
Butane Torch Bottle	Various Locations	Mechanic activities	Excluded Hazardous if recycled	Place drained Butane Torch Bottles in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster	Prosolv Butane Bottle processor I
Cardboard/Office Paper	Parts Department & Offices	Shipping Boxes & Office Activities	Non-Hazardous	RAA in the Hog Barn	Place on pallet in RAA and band for shipment to assigned site for recycling.	
Computers Discarded	Parts Department & Offices	Replacement	Non-Hazardous	Place in RAA @ EMS Conex	Ship to assigned site for recycling or disposal	
Diesel Filters-Used	Equipment Repair Shop and Fab Shop	Filter Changes	Non-Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Diesel Rags	Various Locations	Mechanic activities	Non-Hazardous	Oily waste rag in clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Drained Diesel	Equipment Repair and Fab Shop	Draining diesel fuel and filters	Non-Hazardous when burned as off-Spec fuel	Place in "used oil" tank in the equipment repair shop and fab shop.	Burned for energy recovery in our clean burn multi-oil heating system.	
Empty Paint Cans	Various Locations	Painting activities	Non-Hazardous	No storage allowed	Ship to assigned site for recycling or disposal	Paint cans must be RCRA empty.
Fluorescent Light Ballast	Various Locations	Failure	Non-Hazardous unless they contain PCB's or DEHP	None	Place in Non-Burnable Dumpster	Ballast will say on the label if it contains PCB's
Fluorescent Light Bulbs	Shops, Office Areas	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA in the EMS Conex	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Glass	Various Locations	Replacement	Non-Hazardous	None	Place in Non-Burnable Dumpster	Ensure glass containers are empty.
Glycol Rags	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Minimize use of absorbent rags
Glycol-Used	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	RAA - self contained tank on recycling unit	Recycled in glycol recycling unit	Recycling unit stored in Equipment Repair Shop
Grinding Wheels	Equipment Repair Shop and Fab Shop	Grinding activities	Non-Hazardous	None	Place in Non-Burnable Dumpster	
Hoses & Belts	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in Non-Burnable Dumpster of NSB or into the Oily Waste WAA's	Place in Non-Burnable Dumpster	Drain all fluids from hoses
Metal Shavings/Cuttings	Equipment Repair Shop and Fab Shop	Fabricating activities	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Place in recycle metal dumpster	Ensure there are no free flowing cutting fluids present before disposal.

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Oil Filters-Used	Equipment Repair Shop and Fab Shop	Oil filter changes	Excluded Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Oil-Used	Equipment Repair Shop, Fab Shop, Service Trucks	Draining oil and filters	Excluded Hazardous if burned for energy recovery	Receiving sumps are located in the Equipment Repair Shop and Fab Shop	Burned for energy recovery in clean burn multi-oil heating system.	Keep lids on receiving sumps at all times. DO NOT PUT SOLVENTS INTO USED OIL
Oily Waste (rags, absorbents)	Various Locations	Mechanic activities, equipment drips and leaks	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Collected daily. See "Ash" for management and disposal
Paint Waste (rags, rollers, brushes, etc.)	Various Locations	Painting activities	Determine on per occurrence basis. Use MSDS or testing	If hazardous, store in the assigned area. If non-hazardous, no storage is required.	If hazardous, ship to assigned site for disposal. If non-hazardous, place in burnable waste dumpster.	Need to review MSDS, do analytical test, or use generator knowledge to make waste determinations.
Parts Cleaner Rags	Equipment Repair Shop	Cleaning parts	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Scrap Metal	Various Locations	Fabrication activities & house cleaning	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Place in recycle metal dumpster	Eye Protection Gloves
Sodium Vapor/ Metal Halide Light Bulbs	Various Locations	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA.	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Tires	Various Locations	Replacement	Non-Hazardous	None	Place tires up to 20" rim diameter into dumpster.	

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Toner Cartridges	Offices	Copiers, printers, fax machines	Non-Hazardous	Placed in original container in RAA	Ship to assigned site for recycling or disposal	Verify toner is expended before disposal.
Water Scrubber Filter & Absorbents	Equipment Repair Shop and Fab Shop	Filtering sump water in shops	Non-Hazardous	None	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Welding Rods	Various Locations	Welding activities	Excluded Hazardous	Placed in recycle metal dumpster or metal only RAA's	Ship to assigned site for recycling or disposal	See "Scrap Metal" for waste stream management
Wood Waste	Various Locations	Various activities and shipping pallets	Non-Hazardous	Store on the far back corner of the pad or in the dump truck box if available.	Place in recycle wood dumpster	Pallets are refurbished and recycled when possible

Storage Requirements

NC Sturgeon must ensure project related wastes are stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees. Proper waste receptacles must be provided for trash and materials that may be reused or recycled during a project.

Education and Training

Employees shall be instructed on the proper disposal method of wastes. Examples include:

- General instruction on disposal of non-hazardous wastes, trash or scrap materials
- Minimization methods to reduce waste
- Recycling methods
- If wastes generated are hazardous then employees shall be trained to ensure proper disposal and compliance with regulations.

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Purpose

- To provide guidelines for identifying, assessing and controlling workplace hazards;
- To ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace;
- To identify the jobs/tasks which require risk assessment.

Key Responsibilities

As specified within this program.

NC Sturgeon must assess a work site and identify existing or potential hazards before work begins at the work site or prior to the construction of a new work site

Hazard and Risk Identification

The hazard identification process is used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable.

The Safety Manager shall conduct a baseline worksite hazard assessment which is a formal process in place to identify the various tasks that are to be performed and the accompanying identified potential hazards. The results are included in a report of the results of the hazard assessment and the methods used to control or eliminate the hazards identified. The hazard assessment report must be signed and have the date on it.

Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work;
- Legal and other requirements;
- Previous incidents and non-conformances;
- Sources of energy, contaminants and other environmental conditions that can cause injury;
- Walk through of work environment;

Hazards identifications (as examples) are to include:

- Working Alone
- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Musculoskeletal Disorders
- Bloodborne Pathogens
- Confined Spaces

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- Driving
- General Safety Precautions
- And any other established policy or procedure by **NC Sturgeon**
- Any other site specific work scope

NC Sturgeon has a formal process for identifying potential hazards. Processes are in place to identify potential hazards by the use of JSA's, JHA's, facility wide or area specific analysis/inspections.

All identified hazards are assessed for risk and risk controls are assigned within the worksite hazard assessment for that specific hazard.

Employees and/or sub-contractors are actively involved in the hazard identification process. The **NC Sturgeon** program provides processes to ensure employees and/or sub-contractors are actively involved in the hazard identification process and hazards are reviewed with all employees concerned.

Employees are trained in the hazard identification process. Employees will be trained in the hazard identification process including the use and care of proper PPE.

Unsafe hazards must be reported immediately and addressed by the supervisor. The supervisor discusses the worksite hazard assessment with employees at the respective work location during the employee's documented orientation.

Review of Hazard Assessment

Existing worksite hazard identifications are formally reviewed annually or repeated at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions and specifically updated when new tasks are to be performed that have not been risk assessed, when a work process or operation changes, before the construction of a new site or when significant additions or alterations to a job site are made.

The respective supervisor or project manager advises the Safety Manager when additional hazards are introduced into the work place in order to revise planning and assessment needs.

Risk Assessment

Hazards are classified and ranked based on severity. The program identifies hazards are classified/prioritized and addressed based on the risk associated with the task. (See the risk analysis matrix outlining severity and probability).

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NC Sturgeon RISK ASSESSMENT MATRIX

CONSEQUENCE					PROBABILITY				
Severity	People	Assets	Environment	Reputation	A	B	C	D	E
					Not Done	Rarely	Once a week	Several Times in a Week	Multiple Times in a Day
0	No health effect	No damage	No effect	No impact					
1	Slight health effect	Slight damage	Slight effect	Slight impact					
2	Minor health effect	Minor damage	Minor effect	Limited impact					
3	Major health effect	Localized damage	Localized effect	Considerable impact					
4	Single fatality	Major damage	Major effect	National impact					
5	Multiple fatalities	Extensive damage	Massive effect	Global impact					

Key	Manage for continuous improvement (Low)	Incorporate risk reduction measures (Medium)	Intolerable (High)
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Risk Controls/Methods to Ensure Identified Hazards Are Addressed and Mitigated

The following describes how identified hazards are addressed and mitigated:

- Risk assessed hazards are compiled with and addressed and mitigated through dedicated assignment, appropriate documentation of completion, and implemented controls methods including engineering or administrative controls and PPE required into the worksite hazard assessment of the site specific HSE plan. No work will begin before the worksite assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.
- If an existing or potential hazard to workers is identified during a hazard assessment **NC Sturgeon** must take measures to eliminate the hazard, or if elimination is not reasonably practicable, control the hazard. If reasonably practicable, **NC Sturgeon** must eliminate or control a hazard through the use of engineering controls. If a hazard cannot be adequately controlled using engineering controls, COMPANY must use administrative controls that control the hazard to a level as low as reasonably achievable. If the hazard cannot be adequately controlled using engineering and/or administrative controls, COMPANY must ensure that the appropriate personal protective equipment (PPE) is used by workers affected by the hazard. **NC Sturgeon** may use a combination of engineering controls, administrative controls, and personal protective equipment if there is a greater level of worker safety because a combination is used.

Emergency Control of Hazards

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those personnel with training on fire safety, gas supply shut off and other

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related controls will attempt to resolve the emergency control of a hazard. **NC Sturgeon** will make every possible effort to control the hazard while the condition is being corrected or under the supervision of client emergency response personnel in every emergency.

Certification of Hazard Assessment

The Safety Manager completes and signs the certification of hazard assessment for the worksite hazard assessment (also see PPE Program) and includes it within the site specific HSE plan. Hazard assessments are reviewed annually and updated when new tasks are to be performed that have not been risk assessed.

Job Safety Analysis (JSA)

For those jobs with the highest injury or illness rates, jobs that are new to our operation, jobs that have undergone major changes in processes and procedures or jobs complex enough to require written instructions will have a Job Safety Analysis performed. Completed JSAs are available from the Safety Manager.

Site Specific HSE Plan (SSSP)

Each work location has a site specific HSE plan. Each employee reporting to a location shall receive a documented orientation from a **NC Sturgeon** supervisor that includes the SSSP for that site. The SSSP contains the COMPANY Health and Safety Policy, site specific safety requirements as well as a PPE matrix and a signed site specific worksite hazard assessment for that location, which the **NC Sturgeon** has a responsibility to provide.

Review Process

The hazard assessment program will be reviewed to ensure no new hazards derived from the corrective measures. The review shall include a management of change consideration as well.

The safety committee shall be involved in the review process as well.

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JOB SAFETY ANALYSIS FORM

Location / Dept:			Date:		New? ☐		Revision ☐		JSA NO:	
Task						Supervisor:				
						Analysis By:				
Team Members						Reviewed By:				
						Approved By:				
Specific rules and procedures to be followed (Safe Work Practice Number ____):										
Sequence of Basic Job Steps			Potential Injury or Hazards			Recommendations to Eliminate or Reduce Potential Hazards.				
CHECK ITEMS REQUIRED TO DO THIS JOB:										
Safety Glasses	☐	Leather Gloves	☐	Face Shield	☐	Fire Extinguisher	☐	Atmospheric Testing	☐	
Hard Hats	☐	Work Vest	☐	Goggles (type?)	☐	Lockout/Tagout	☐	Traffic Control	☐	
Safety Shoes	☐	Fall Harness	☐	Flame Resistant Clothing	☐	Warning signs	☐	Other	☐	

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INSTRUCTIONS FOR COMPLETING THE JOB SAFETY ANALYSIS FORM

Select an employee to help you with the JSA: someone who is experienced in the job, willing to help and a good communicator. The employees play an important role in helping you identify job steps and hazards. In summary, to complete this form you should consider the purpose of the job, the activities it involves, and the hazards it presents. In addition, observing an employee performing the job, or “walking through” the operation step by step may give additional insight into potential hazards. Here’s how to do each of the three parts of a Job Safety Analysis:

SEQUENCE OF BASIC JOB STEPS	POTENTIAL HAZARDS	RECOMMENDED ACTION OR PROCEDURE
Examining a specific job by breaking it down into a series of steps or tasks, will enable you to discover potential hazards employees may encounter. Each job or operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity, change in direction or movement. Picking up the box from the conveyor and placing it on a hand truck is one step. The next step might be to push the loaded hand truck to the storage area (a change in activity). Moving the boxes from the truck and placing them on the shelf is another step. The final step might be returning the hand truck to the receiving area. Be sure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the casters on the hand truck. However, if that step is generally part of the job it should be listed.	A hazard is a potential danger. The purpose of the Job Safety Analysis is to identify ALL hazards – both those produced by the environment or conditions and those connected with the job procedure. To identify hazards, ask yourself these questions about each step: Is there a danger of the employee striking against, being struck by, or otherwise making injurious contact with an object? Can the employee be caught in, by or between objects? Is there a potential for slipping, tripping, or falling? Could the employee suffer strains from pushing, pulling, lifting, bending, or twisting? Is the environment hazardous to safety and/or health (toxic gas, vapour, mist, fumes, dust, heat, or radiation)? Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards – the actions, conditions, and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents.	Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury or occupational illness. Begin by trying to: (1) engineer the hazard out; (2) provide guards, safety devices, etc.; (3) provide personal protective equipment; (4) provide job instruction training; (5) maintain good housekeeping; (6) ensure good ergonomics (positioning the person in relation to the machine or other elements). List the required or recommended personal protective equipment necessary to perform each step of the job. Give a recommended action or procedure for each hazard. Serious hazards should be corrected immediately. The JSA should then be changed to reflect the new conditions. Finally, review your input on all three columns for accuracy and completeness with affected employees. Determine if the recommended actions or procedures have been put in place. Re-evaluate the job safety analysis as necessary.

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Purpose

The purpose of this program is to provide a process to minimize employee-hearing loss caused by excessive occupational exposure to noise.

Scope

This program is applicable to all employees who may be exposed to noise in excess of 85 decibels (decibels). When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Audiometric testing - means detection by the person being tested of a series of pure tones. For each tone, the person indicates the lowest level of intensity that they are able to perceive.

Decibels – means the sound energy measured by a sound level meter using the “A” scale. The “A” scale is electronically weighted to simulate the response of the human ear to high and low frequency noise.

Slow Response – means the setting on the sound level meter that averages out impulses of brief duration that would cause wide fluctuation in the sound level meter reading.

Standard Threshold Shift – means a change in hearing threshold relative to the baseline audiogram of an average of 10 dB (corrected for age) at 2000, 3000 and 4000 Hz in either ear.

Key Responsibilities

Managers and Supervisors

- Ensure requirements of this program are established and maintained.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Wear hearing protection when required, attend the training, and cooperate with testing and sampling.

Procedure

Occupational hearing loss is a cumulative result of repeated or continued absorption of sound energy by the ear; employee protection is based on reduction of the noise level at the ear or limiting the employee's exposure time. **NC Sturgeon** shall offer hearing protection to all employees exposed to potential high noise levels in working areas and to those employees requesting hearing protection.

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Hearing Conservation Program

NC Sturgeon shall administer a continuing effective hearing conservation program when employees, who work in areas where the exposure to noise levels are 85 decibels or greater for the 8 hour time-weighted average of 85 decibels, must wear hearing protection and **NC Sturgeon** shall implement a monitoring program to identify employees to be included in the hearing conservation program. Employees will wear hearing protection in signed areas while on an owner client facility.

Surveys

Surveys will be conducted by a qualified employee or third party.

To evaluate noise exposure in terms of possible hearing damage, it is necessary to know the overall sound level ("A" scale measurement), the exposure time of the individual in hours per day and the length of time the individual has worked in the area being surveyed. This data shall be supplemented by the following:

- Name of area and location
- Date and time of survey
- Name of person conducting survey
- Description of instrument used, model and serial number
- Environmental conditions
- Description of people exposed

NC Sturgeon shall notify each employee of their monitoring results, or, if their job is exposed to noise 85 decibels or greater.

A plot of noise levels must be made for owned facilities. The plot must be filed or posted at the facility.

NC Sturgeon shall evaluate hearing protector attenuation for the specific noise environments in which the protector will be used. The adequacy of hearing PPE shall be reevaluated whenever noise exposures increase to the point that the PPE provided may no longer provide adequate protection. **NC Sturgeon** shall then provide more effective PPE where necessary.

All sound measuring equipment must be calibrated before and after each survey. Records of sound measuring equipment calibration and noise level surveys shall be kept for 20 years.

Noise Surveys must be repeated whenever changes in the workplace may expose additional personnel to high noise or hearing protection being used by employees may not be adequate to reduce the noise exposure to a level below 85 decibels.

Sound Level Surveys

- All owned facilities that are suspected of having noise levels exceeding 85 decibels must be screened.

Exposure Surveys:

- A representative sampling of employees shall be conducted to determine the exposure to noise over a period of time.

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- Noise dosimeters must be capable of integrating all continuous, intermittent and impulsive sound levels from 80 dB to 130 dB and must be calibrated so a dose of 50% corresponds to a time weighted average of 85 dB.

Signage

Clearly worded signs shall be posted at entrances to, or on the periphery of, areas where employees may be exposed to noise levels in excess of 85 decibels. These signs shall describe the hazards involved and the required protective actions.

Audiometric Testing

NC Sturgeon shall establish and maintain an audiometric testing program by making audiometric testing available to all employees whose exposure to noise 85 decibels (8 hr TWA) or greater and employees should take an audiogram annually. The program shall be provided at no cost to employees.

- NC Sturgeon** shall establish a valid baseline audiogram against which future audiograms can be compared. An employee must receive a baseline audiogram within six months of their first exposure to 85 decibels or greater for an eight hour period.
- When a mobile van is used the baseline shall be established within one year.
- An employee shall receive an annual audiogram every year they work in a position that is exposed to noise 85 decibels or greater.
- A qualified third party shall perform all audiometric testing, evaluation, reporting and retesting.
- Audiometric testing shall be preceded by a period of at least 14 hours during which there is no exposure to workplace sound levels in excess of 80 decibels. This requirement may be met by the use of hearing protectors that reduce the employee noise exposure level below 80 decibels and employees shall also be notified to avoid high levels of noise.
- An otoscopic exam is required before an audiogram is initiated. A qualified person shall examine the ear canal for any ear infections or canal irregularities that might affect the audiogram or rule out the use of earplugs.

At least annually after obtaining the baseline audiogram, **NC Sturgeon** shall obtain a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels. Annual audiograms shall be evaluated as follows:

- Each audiogram shall be compared to the employees' baseline audiogram to ensure the test was valid and to determine if a standard threshold shift has occurred.
- If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift, the employee shall be informed of this fact in writing, within 21 days of the determination.
- If a standard threshold shift is determined, the employee will be retested within 30 days.
- The retest results will be considered as the annual audiogram.
- Employees shall be informed of their audiometric test results in writing within 21 days of determination.
- If the employee has sustained a standard threshold shift, after retesting, that employee shall be retrained and refitted for appropriate hearing protection.
- The employee shall be referred for additional medical evaluation if indicated.

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Records

NC Sturgeon shall maintain accurate record of all employee exposure measurements and that all records are maintained as required by CFR 1910.95 (Occupational Noise Exposure).

Employee audiograms are considered medical/exposure records. These records must be kept for the length of employment plus 30 years.

Hearing Protection Devices

Earmuffs and earplugs shall be made available to employees in sizes and configurations that will be comfortable to the employee. Hearing protection devices shall be made available to all employees exposed to an 8 hour time-weighted average of 85 db or greater at no cost to employees. Hearing protectors shall be replaced as necessary. Employees shall be instructed how to obtain the proper fit. **NC Sturgeon** shall ensure that hearing protectors are worn.

Employees will be given an opportunity to select their hearing protection from **NC Sturgeon** provided selection. Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by **NC Sturgeon**.

TRAINING

A training program shall be instituted for all employees who are exposed to a noise action level or work in high noise areas. Noise awareness training for employees shall be provided before initial assignment and on an annual basis. The training shall be repeated annually for each employee.

The training shall address the effect of noise on hearing; the purpose of hearing protectors, including the advantages, disadvantages and alternatives of various types, including instructions on selection, fitting, use and care of and the purpose of audiometric testing and an explanation of test procedures.

Training shall be updated to be consistent with changes in the work process, PPE requirements and the proper techniques of wearing hearing protection.

All staff shall have a copy of this program, noise exposure procedures and it shall be posted at the worksite and a copy made available to all employees, their representatives and regulatory agencies (Assistant Secretary and the Director will have access to records).

The training must be documented.

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Purpose

This program is designed to reduce the risk of work-related heat illnesses.

Scope

This procedure applies to all work being performed in hot environments.

Definitions

"Acclimatization" means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.

"Heat Illness" means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

"Preventative recovery period" means a period of time to recover from the heat in order to prevent heat illness.

"Shade" means blockage of direct sunlight. Canopies, umbrellas and other temporary structures or devices may be used to provide shade. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning.

Requirements

All managers and supervisors are responsible for implementing and maintaining the Heat Illness Program in their work areas.

Provision of Water

Employees shall have access to potable drinking water. Employees shall have access to potable drinking water. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity at the beginning of the work shift.

Access to Shade

Employees will be provided with access to shade. Employees suffering from heat illness or believing a preventative recovery period is needed, shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling. Such access to shade shall be permitted at all times. See definition of "Shade".

Control Measures

Each work location involved in working in hot environments shall implement measures that must be in place to control the effects of environmental factors that can contribute to heat related illnesses. The most common environmental factors are air temperature, humidity, radiant heat sources and air circulation.

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Physical factors that can contribute to heat related illness shall be taken into consideration before performing a task. The most common physical factors that can contribute to heat related illness are type of work, level of physical activity and duration, and clothing color, weight and breathability.

Supervisors must ensure personal factors that contribute to heat related illness are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. The most common personal factors that can contribute to heat related illness are age, weight/fitness, drug/alcohol use, prior heat-related illness, etc.

Each work site shall develop site specific procedures but shall include the minimum:

- Bring at least 2 quarts per employee at the start of the shift and the supervisors/designated persons will monitor water containers every 30 minutes, and employees are encouraged to report to supervisor/designated person low levels or dirty water.
- Supervisors will provide frequent reminders to employees to drink frequently.
- Every morning there will be short tailgate meetings to remind workers about the importance of frequent consumption of water throughout the shift during hot weather.
- Place water containers as close as possible to the workers.
- When drinking water levels within a container drop below 50%, the water shall be replenished immediately or water levels should not fall below the point that will allow for adequate water during the time necessary to effect replenishment.
- Disposable/single use drinking cups will be provided to employees or provisions will be made to issue employees their own cups each day.
- Supervisors will set-up an adequate number of umbrellas, canopies or other portable devices at the start of the shift and will relocate them to be closer to the crew, as needed.
- Non-agricultural employers can use other cooling measures if they demonstrate that these methods are as effective as shade.
- Working hours will be modified to work during the cooler hours of the day, when possible.
- When a modified or shorter work-shift is not possible, more water and rest breaks will be provided.
- Supervisors will continuously check all employees and stay alert to the presence of heat related symptoms.
- Supervisors will carry cell phones or other means of communication, to ensure that emergency services can be called and check that these are functional at the worksite prior to each shift.
- Every morning, workers will be reminded about address and directions to the worksite to inform medical responders and emergency procedures.
- All newly hired workers will be assigned a buddy or experienced coworker to ensure that they understood the training and follow the company procedures.

Training

Training in the following topics shall be provided to all supervisory and non-supervisory employees:

- The environmental and personal risk factors for heat illness;

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- The importance of frequent consumption of small quantities of water, up to 4 cups per hour, when the work environment is hot and employees are likely to be sweating more than usual in the performance of their duties;
- The importance of acclimatization;
- The different types of heat illness and the common signs and symptoms of heat illness;
- The importance to employees of immediately reporting to the employer, directly or through the employee's supervisor, symptoms or signs of heat illness in themselves, or in co-workers;
- **NC Sturgeon** procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary;
- **NC Sturgeon** procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider;
- **NC Sturgeon** procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders.

Supervisors must receive training in the prevention of heat related illnesses prior to supervising employees working in heat. Supervisors will be trained in the **NC Sturgeon** heat illness emergency response procedures to prevent heat illness and procedures to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.

Communication for employees shall be in a form readily understandable by all affected employees.

NC Sturgeon shall ensure all contractors, subcontractors, staffing companies, etc. employees (including temporary) working outdoors have been trained in heat illness prevention.

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PLEASE NOTE:

If at any given time NC Sturgeon is required to use a ladder, the following shall be the program that our employees shall follow.

Purpose

The purpose of the program is to prescribe rules and establish minimum requirements for the construction, care, and use of the common types of ladders.

All ladders that are purchased and placed into service; or, any ladders that are engineered, manufactured and installed on any of NC Sturgeon equipment shall follow the requirements set forth by this program.

Scope

This program is applicable to all employees who may utilize ladders. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers NC Sturgeon employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Ladder - an appliance usually consisting of two side rails joined at regular intervals by cross- pieces called steps, rungs, or cleats, on which a person may step in ascending or descending.

Stepladder - a self-supporting portable ladder, nonadjustable in length, having flat steps and a hinged back. Its size is designated by the overall length of the ladder measured along the front edge of the side rails.

Single ladder - a non-self-supporting portable ladder, nonadjustable in length, consisting of but one section. The overall length of the side rail designates its size.

Extension ladder - a non-self-supporting portable ladder adjustable in length. It consists of two or more sections traveling in guides or brackets so arranged as to permit length adjustment. Its size is designated by the sum of the lengths of the sections measured along the side rails.

Fixed ladder - a ladder permanently attached to a structure, building, or equipment.

Individual-rung ladder - a fixed ladder each rung of which is individually attached to a structure, building, or equipment.

Cage - a guard that may be referred to as a cage or basket guard, which is an enclosure that is fastened to the side rails of the fixed ladder or to the structure to encircle the climbing space of the ladder for the safety of the person who must climb the ladder.

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Key Responsibilities

Managers and Supervisors

- Managers and supervisors are responsible for ensuring that all employees, and/or contractors have been trained in the use and inspection of ladders in accordance to the manufactures guidelines.
- Managers and supervisors are responsible for ensuring that all employees and contractors are aware that if an inspection discovers a defect, the ladder shall not be used and taken out of service.

Employees

- Employees shall inspect ladders prior, during and at the completion of each use to ensure the condition of the ladder and the safety of its occupants.
- Employees are responsible for following this program and reporting any damage or repairs that may be needed to their supervisor.

Procedure

Inspection, Care and Safe Work Practices of Ladders

Inspection

Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.

- Ladder rungs, cleats and steps shall be parallel, level and uniformly spaced when the ladder is in position for use.
- Any ladder has developed defects, shall be withdrawn from service for repair or destruction and tagged or marked as "Dangerous, Do Not Use."
- If a ladder is tipped over, it shall be inspected by a competent person for side rail dents or bends, or excessively dented rungs; check all rung to side rail connections; check hardware connections; check rivets for shears.
- 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.

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Care

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.

Metal bearings of locks, wheels, pulleys, etc., shall be frequently lubricated.

Frayed or badly worn rope shall be replaced. Safety feet and other auxiliary equipment shall be kept in good condition to ensure proper performance.

Rungs shall be kept free of grease and oil.

Ladders shall be stored in a well-ventilated area in a manner to prevent sagging and warping.

Safe Work Practices

Ladders shall be used only for the intended purpose for which they were designed.

The ladder shall be secured at the top or held by another person at the base.

The footing of the ladder shall be placed on a stable and level surface.

Ladders shall extend 3 feet above the top of an upper landing surface and extension ladders shall be placed at a 4:1 ratio.

When ladders are not able to be extended then the ladder shall be secured at its top to a rigid support that will not deflect.

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

Ladders shall not be used in a horizontal position as platforms, runways, or scaffolds.

Ladders shall not be used by more than one man at a time.

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

If a ladder is used in a high traffic area, barricades shall be placed to avoid accidental displacement due to collisions.

Do not stand on the top two rungs or top of step ladders.

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On two-section extension ladders the minimum overlap for the two 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

No ladder shall be used to gain access to an elevated surface unless the top of the ladder extends at least 3 feet above the point of support, and properly tied off.

The employee shall maintain a three (3)-point grip on the ladder at all times and carry tools/equipment on a belt or hoist up. Do not carry anything in the hands that could cause injury in case of fall.

The employee shall face the ladder while ascending or descending.

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

The ladder shall not be moved while occupied.

Portable Ladders

Stepladders shall not be longer than 20 feet.

Single ladders shall not be longer than 30 feet.

A two-section extension ladders shall not be longer than 60 feet. All ladders of this type shall consist of two 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.

Keep all ladders at least ten (10) feet away from power lines.

Ladders shall not be loaded beyond the maximum intended load for which they were built or in excess of the manufacturer's rated capacity. Weight includes the combined weight of the climber and his tools/equipment. Ladders are rated as the following:

- I (holds 250 lbs)
- I-A (holds 300 lbs)
- II (holds 225 lbs)
- III (holds 200 lbs)

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Fixed Metal Ladders

Ladders shall be constructed to withstand a minimum of 200 pounds.

All metal rungs shall have a minimum diameter of 1/2 inches and wooden rungs shall have a minimum diameter of 1 1/8 inches.

Rungs shall not be more than 12 inches apart and shall be uniform throughout the length of the ladder.

Rungs shall be a minimum length of 16 inches and provide protection so a foot cannot slip off the end.

Rungs shall have a minimum of 7 inches between itself and the structure behind it.

A fall restraint system must be provided for all fixed ladders greater than six feet in length.

- A Cage is required when the fixed ladder is at least twenty feet tall.
- Cages on fixed ladders shall not begin at a point less than 7 feet nor greater than 8 feet from the walking surface below the cage.
- Cages shall provide a clear width of 15 inches in each direction of the rung's centerline.
- Cages shall not extend less than 27 inches, but not greater than 28 inches from the centerline of the rung.
- A climbing fall restraint system may be substituted for a ladder cage.

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Purpose

The purpose of this procedure is to advise employees in areas where lead is suspected on an awareness level basis about the properties and dangers of lead, general guidelines and training requirements. For more information refer to the Lead safety procedure for **NC Sturgeon**.

Scope

This procedure applies to **NC Sturgeon** operations where employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Responsibilities

Managers and Supervisors

- In coordination with the Safety Manager, develop and implement annual lead awareness training.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Identify possible locations where lead in the workplace may be found.
- Inform the Safety Manager of upcoming work involving known or suspected lead-containing materials, allowing the Safety Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the lead awareness requirements.

Safety Manager:

- Coordinate annual lead awareness training activities.

Employees:

- Comply with the lead awareness requirements and direct any questions or concerns to the Safety Manager.
- Attend required annual training.
- Review material safety data sheets or consult with the supervisor to identify any container with lead-containing material.

Procedure

Health Effects of Lead

Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache, joint or muscle aches, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

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Locations

Each worksite shall create a list of possible locations of lead containing materials such as leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.

The list is to be provided to the Safety Manager on a quarterly basis and revised as lead containing materials are added or eliminated from the previous list.

General Requirements

Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials and will not disturb the lead containing material. Appropriate work practices shall be followed to ensure the lead containing materials are not disturbed. Regulated access signs are to demarcate the lead exposure regulated work areas. The signs should read as follows:

WARNING
LEAD WORK AREA
POISON
NO SMOKING OR EATING

General Work Practices

When working on multi-contractor worksites **NC Sturgeon** employees shall be protected from exposure. If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, **NC Sturgeon** shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

Employees will wash hands and face if lead materials are contacted. Employees' hands and faces shall be washed if lead containing materials are contacted. Any possible contact with lead containing material must be reported immediately to the supervisor or Safety Manager.

If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed.

When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system.

Whenever possible, use a wet system to reduce airborne dust.

Whenever possible, substitute lead material with non-leaded material.

Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.

If respirators are required, they will be NIOSH certified and all employees will follow the **NC Sturgeon** Respiratory Protection Program.

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Training

Lead awareness training is required at time of hire, during orientation or before initial assignment in areas where lead is suspected and annual refresher training is conducted. Lead awareness training is required for employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. Lead awareness training is required at time of hire, during orientation, or before assignment to areas containing lead.

Refresher training must be given annually.

Documentation of training - Lead awareness training shall be documented including dates of training, location of training, employee name and trainer name.

Training will include the health effects of lead, how to report suspected locations of lead containing material and not to disturb any possible lead containing material.

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

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Purpose

The purpose of this program is to establish procedures for affixing appropriate lockout/tagout equipment to energy isolating devices and to otherwise disable machines or equipment to prevent unexpected energization, start up or release of stored energy to prevent injury or incident.

Scope

This program covers the servicing and maintenance of machines and equipment where the unexpected energization or start up of the machine or equipment, or the release of stored energy could cause an incident. This program establishes minimum performance requirements for the control of such hazardous energy. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers NC Sturgeon employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Affected employee - An employee whose job requires them to operate or use a machine or equipment on which servicing and maintenance is being performed under lockout/tagout, or whose job requires the employee to work in an area in which such servicing or maintenance is being performed.

Authorized employee - A person that performs lockout/tagout procedures on machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes authorized when that employee's duties include performing servicing or maintenance covered under this program.

Capable of being locked out - An energy isolating device is capable of being locked out if it has a hasp or other means of attachment to which, or through which, a lock can be affixed, or it has a locking mechanism built into it. Other energy isolating devices are capable of being locked out if lockout can be achieved without the need to dismantle, rebuild or replace the energy isolating device or permanently alter its energy control capability.

Energized - Connected to an energy source or containing residual or stored energy.

Energy isolating device - A mechanical device that physically prevents the transmission or release of energy including, but not limited to, the following:

- A manually operated electrical circuit breaker, a disconnect switch, a manually operated switch by which the conductors and no pole can be operated independently, a line valve, a block and any similar device used to block or isolate energy.
- Push buttons, selector switches and other control circuit type devices are not isolating devices.

Energy source - Any source of gas, electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy sources.

Hot tap - A procedure used in the repair, maintenance and service activities that involves welding on a piece of equipment (pipelines, vessels or tanks) under pressure, in order to install connections or other appurtenances.

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Lockout - The placement of a lockout device on an energy isolating device in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Lockout device - A device that utilizes a positive means, such as either a key or combination type lock, to hold an energy isolating device in the safe position and prevent the energizing of a machine or equipment. Included are blank flanges and bolted slip blinds.

Normal operation - The utilization of a machine or equipment to perform its intended operation.

Servicing and/or maintenance - Workplace activities such as constructing, setting up, adjusting, inspecting, modifying and maintaining and/or servicing machines and equipment, where the employee may be exposed to an unexpected energization or startup of the equipment or release of a hazardous energy source.

Setting up - Any work performed to prepare a machine or equipment for performing its normal operation.

Tagout - The placement of a tagout device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout device - A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until tagout device is removed.

Key Responsibilities

Managers and Supervisors

- Responsible to control and enforce this plan and to see that all their employees and contractors that are affected by lockout/tagout procedures, have the knowledge and understanding required for safe application, usage, and removal of all energy controls and devices.
- Ensure employees are trained and comply with the requirements of this program.

Employees

- Employees who are affected by this program are required to attend training on an annual basis.
- Are required to follow the provisions of this program.

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Procedure

General

Only an authorized employee or employees performing the servicing or maintenance shall perform lockout or tagout.

Devices

Lockout Device - If an energy source can be locked out a device that utilizes a lock to hold an energy isolating device in a safe position shall be used. Each site shall have the same type of lock as specified by NC Sturgeon.

Tagout Device – If an energy source cannot be locked out with a lockout device then a tagout device shall be used. Tagout devices are a warning only level of protection and shall be weather and chemical resistant, standardized in color with clear written warning of hazardous energy; i.e. Do Not Operate, Do Not Start, Do Not Energize, etc. Each site shall have the same style of tags specified by NC Sturgeon.

Specific Energy Control Procedures

Each manager or supervisor is responsible for developing specific step-by-step shutdown and startup procedures for a particular machine or piece of equipment in their respective area.

- A written, step-by-step isolation procedure for shutdown and startup shall be prepared for each type of machine or piece of equipment.
- This procedure shall include:
 - Equipment number if assigned.
 - Equipment location.
 - Energy Source(s) (i.e. electrical, hydraulic, gas pressure, etc.)
 - Location of isolating controls (i.e. breaker switches, valves, etc.)
 - Quantity of isolating controls
 - Quantity of locks required to isolate the equipment
 - Other hardware required to isolate the equipment (i.e. chains, valve covers, blocks, etc.)
 - List any residual energy required to be dissipated before work begins.

Specific Sequence for Application of Energy Control

1. Notification

Authorized employees must notify all other affected employees of the application and removal of lockout/tagout devices. Notification shall be given before the controls are applied and before they are removed from the machine or equipment.

2. Preparation for Shutdown

Before an authorized or affected employee shuts down a machine or equipment, the authorized employee shall have the knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled, and the method or means (locks) to control the energy sources.

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3. Machine or Equipment Shutdown

The machine or equipment shall be shut down using the procedures established for that machine or piece of equipment. The shutdown shall be orderly to avoid any additional hazards to employees as a result of the stoppage.

4. Machine or Equipment Isolation

All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source(s).

5. Lockout/Tagout Devices and Application

- Each authorized employee shall have the proper number of locks and devices to be able to perform proper lockout/tagout procedures for machines or equipment that they may be working on.
- Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
- Each lockout and tagout devices shall include the name of the individual placing the device.
- Lockout devices shall be affixed in a manner to hold the energy isolating devices in a safe or off position.
- Tagout devices shall be affixed in a manner that will clearly indicate that the operation or movement of isolating devices from the safe or off position.
- Tagout devices used with energy isolating devices with the capability of being locked out shall be fastened at the same point at which the lock would have been attached. If a tag cannot be directly attached to the energy isolation device it shall be located as close as safely as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device.
- Each energy source shall be locked out completely isolating the equipment.
- Isolating machines or equipment shall include, but are not limited to:
 - Pumps, compressors, generators, electric distribution, storage tanks, etc.
 - Each type of equipment to be isolated shall have specific procedures for isolation, i.e. for compressors: suction, discharge, power, starting, fuel, dumps shall be closed, locked and tagged out properly. The blow-down valve shall be opened, locked and tagged out properly. (NOTE): If compressor has a side stream hooked up, the side stream shall be closed, locked and tagged out properly.

6. Stored Energy and the Possibility of Re-accumulation

Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained and otherwise rendered safe.

If there is a possibility of re-accumulation of stored energy, verification of isolation shall be continued until the servicing or maintenance operation is completed, or until the possibility of such accumulation no longer exists.

7. Verification of Isolation

The authorized employees performing the lockout procedure verifies/ensures that the equipment is isolated or disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the machine or equipment by operating the control(s) or by testing to make certain the equipment will not operate.

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Multiple Workers

A crew of authorized employees may use a group lockout or tagout device. This will afford the group of employees a level of protection equal to that provided by a personal lockout or tagout device.

- A tailgate meeting shall be conducted to review the lockout procedures and other information as required for safe work to continue – all crafts and effected departments shall be involved.
- An authorized employee will isolate the equipment and ascertain the exposure status of individual group members.
- All workers will then place their individual locks on the device's group lockout or tagout device after they have verified the procedure.
- The crew leader or an assigned authorized employee shall be responsible of assuring the continuity of the lockout procedures including documenting lockout information passed along during a shift or personnel changes.

Release from Lockout/Tagout

When servicing or maintenance is completed or when Lockout / Tagout devices must be temporarily removed, the equipment requires testing and the machine or equipment is ready for testing or to return to normal operating conditions, the following steps shall be taken, in this order:

- Check the machine or equipment and the immediate area surrounding the machine or equipment to ensure that all nonessential items such as tools have been removed and that the machine or equipment components are operationally intact.
- Check the work area to ensure that all personnel have been safely positioned or removed from the area.
- Remove the Lockout/Tagout device
- Energize and proceed with testing
- De-energize and reapply control methods including Lockout / Tagout devices
- Document the procedure by use of the completed isolation log and provide to supervisor for filing.

Removal of Locks

The authorized employee who applied the lock shall be the one to remove their lock. However, after all work has been completed, certain conditions may arise which prohibit this person from being present to remove the lock.

The following procedures shall be followed to allow for the removal of a lock that another person has applied:

- Every effort shall be made to contact the authorized employee who applied the lock to obtain the key(s).
- If the key(s) cannot be made available, the employee who requests removal of the lock shall contact their supervisor.
- The supervisor shall verify that every effort was made to contact the original authorized employee who applied the lock and to obtain the key(s).
- The employee removing the lock shall note on the Service Report that the lock(s) were removed with permission by supervisor.
- All reasonable efforts will be made by supervisor to notify that employee their lock has been removed, ensuring that the authorized employee has this knowledge before they return to work.

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- If the equipment is client owned, the supervisor or employee requesting to remove the lock(s) shall contact the client to get the lock removed. Clients must remove their lock(s).
- NOTE: NC Sturgeon employees shall not remove any client locks.

Shift or Personnel Changes

In the event shift or personnel changes occur during maintenance and/or repair activities, the designated NC Sturgeon employee in charge shall take the necessary steps to maintain the continuity of the lockout/tagout protection. This includes maintaining that all provisions in this procedure are adhered to and the transfer of lockout/tagout devices between authorized employees is accomplished.

Contractors

Contractors performing lockout procedures on NC Sturgeon property shall comply with this procedure. Contractors shall supply their own locks.

NC Sturgeon shall initially lockout NC Sturgeon machines and equipment before the contractor will be allowed to apply their own lock in addition to the NC Sturgeon's.

Annual Audits

Each year the manager or supervisor, or his representative, will perform an inspection of the Lockout Program in their respective areas to verify the effectiveness of the program. An authorized employee other than the one(s) utilizing the energy control procedure being inspected shall perform the audit and shall verify that:

- Each authorized and/or affected employee has been trained as required.
- Any new equipment added has specific lockout procedures developed and documented.
- Current procedures are adequate for performing complete isolation of equipment and resulting in a zero energy state.
- The annual audit will be certified in writing and a copy of the audit maintained on file at the managers/supervisors office.

TRAINING

NC Sturgeon shall provide training to ensure that the purpose and function of the energy control program are understood by authorized employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The training shall include the following:

- The recognition of applicable hazardous energy (lockout/tagout) sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control.
- The purpose and use of energy control procedures.
- When tagout systems are used, employees shall also be trained in the following limitations of tags:
 - Tags are essentially warning devices affixed to energy isolating devices, and do not provide the physical restraint on those devices that is provided by a lock.

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- When a tag is attached to an energy isolating means, it is not to be removed without authorization of the authorized person responsible for it, and it is never to be bypassed, ignored, or otherwise defeated.
- Tags must be legible and understandable by all authorized employees, affected employees, and all other employees whose work operations are or may be in the area, in order to be effective.
- Tags and their means of attachment must be made of materials which will withstand the environmental conditions encountered in the workplace.
- Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.
- Tags may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program.

All other employees whose work operations are or may be in an area where energy control procedures may be utilized, shall be instructed about the procedure, and about the prohibition relating to attempts to restart or reenergize machines or equipment which are locked out or tagged out.

Retraining

Retraining shall be conducted whenever a periodic inspection reveals, or whenever NC Sturgeon has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

Retraining is also required when there is a change in job assignments, in machines, a change in the energy control procedures or a new hazard is introduced.

The retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary.

Training Documentation

NC Sturgeon shall certify that employee training has been accomplished and is being kept up to date. All training and/or retraining must be documented, signed and certified.

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SPECIFIC EQUIPMENT LOCKOUT PROCEDURES

Department _____

Equipment No. _____

Energy Source _____

Procedure for Shutdown and Isolation:

(List number of steps required to isolate machine or equipment - write N/A on lines not used or add additional steps if necessary)

STEP NO.

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

Additional Information: _____

Prepared By: _____ Date: _____

(This procedure to be communicated to all authorized and affected employees and kept on file at location of machine or equipment)

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SAMPLE TAG

WARNING

MINIMUM LOCK/OUT – TAG/OUT PROCEDURES

Inlet Suction Block Valve Discharge Block Valve
 Fuel Gas Valve Start Gas Valve
 Liquid Dump Line Blow Down (Lock Open)

When working on this compressor package the following items must be **LOCKED OUT & TAGGED OUT**. Residual pressure must be blown down. Open all valves on surge bottles and piping to relieve any pressure that may be trapped.

Side Stream (For Units Set up with Side Streams)

When working on the compressor each person must lock and tag the compressor package!

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ISOLATION LOG

Date of Isolation:

Description of Work:

List of Equipment out of Service:

Necessary Requirements of Clear Isolation:

Authorized Employee Signature: _____

Person Continuing Work Signature: _____

Locks/Tags for GROUP LOCKOUT or Multiple Locks/Tags

Lock # or Tag	Date Installed	Date Removed	Print Name (for Group Lockout)	Signature

(If additional space is needed, please attach an additional page)

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ANNUAL AUDIT OF THE CONTROL OF HAZARDOUS ENERGY PROGRAM

I certify that an audit of the NC Sturgeon "Control of Hazardous Energy" Program was conducted and that each employee has been trained in the recognition and procedures to lockout equipment they may be required to work on or may be affected by.

I further acknowledge that the current procedure is adequate to safely lockout equipment in this department for servicing and maintenance.

Department: _____

Manager (or representative): _____

Date: _____

Original to file: _____

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Purpose

NC Sturgeon is committed to providing a safe and healthy working environment for all employees. Musculoskeletal disorders (MSD) account for a majority of reported injuries and we must minimize the risk and incidence of MSDs. To achieve this goal, NC Sturgeon requires each worksite to establish and maintain a MSD, Lifting and Handling Loads Program with the following elements:

- Ongoing training of management, supervisors, and employees (including new hires) on MSD awareness hazards and control measures
- Training of specialized staff (designated NC Sturgeon Representative) on MSD hazard assessment and control measures
- Tracking of MSD statistics
- MSD hazard identification and assessment (see MSD Hazard Identification form)
- Control of MSD hazards through the application of engineering and/or administrative controls
- Proactively integrating ergonomics principles into workplace design and work techniques
- A realization that personal protective equipment may only be used as a substitute for engineering or administrative controls if it is used in circumstances in which those controls are not practicable.

Key Responsibilities

NC Sturgeon Safety Manager

- Communicate, promote and support the MSD, Lifting and Handling Loads Program.
- Conduct MSD training sessions and/or provide MSD training materials.
- Maintain records of MSD training that they provide in a manner that supports accuracy and ease of access for monitoring purposes.
- Monitor corrective actions taken as identified on incident reports.
- Support supervisors and the worksite JHSC in the Lifting and Handling Loads Program process.
- Assist in the investigation of MSD incidents to address injury hazards.
- Bring to the attention of NC Sturgeon management any MSD hazards identified during their investigations, audits or inspections.
- Ensure distribution and awareness of MSD Hazard Identification Forms.
- Provide input into the development of safe work procedures to reduce MSD hazards.

Worksite Manager

Responsible for the implementation and maintenance of the Lifting and Handling Loads Program for their facility and ensuring all assets are made available for compliance with the procedure. He will also:

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- Ensure that all worksite departments implement and maintain the provisions of the Lifting and Handling Loads Program.
- Seek regular reports to ensure that their worksite is in compliance with the Lifting and Handling Loads Program.
- Manual lifting equipment such as dollies, hand trucks, lift-assist devices, jacks, carts, hoists must be provided for employees. Use of provided manual lifting equipment by employees must be enforced.

Employees

- Shall attend all MSD related training for the task they are performing.
- Practice MSD prevention strategies as per MSD training.
- Comply with safe work procedures.
- Correctly use the equipment provided by NC Sturgeon, according to manufacturers' recommendations.
- Report to the supervisor any unsafe acts, unsafe tasks, unsafe conditions or equipment problems that create MSD hazards.
- Report any MSD incidents to the supervisor and cooperate in the investigation process.

Procedure

Worksite Assessment

Before manual lifting is performed, a hazard assessment must be completed. The assessment must consider size, bulk, and weight of the object(s), if mechanical lifting equipment is required, if two-man lift is required, whether vision is obscured while carrying and the walking surface and path where the object is to be carried. The assessment shall also include:

- Use of the MSD Hazard Identification form contained within this procedure
- Physical Demands
 - Neck Back Shoulder Wrist
 - Hand
 - Knee Ankle/
 - Feet
- Force Required and Working Distance
 - Do employees push, pull, lift, lower, or carry objects that are too heavy or require too much force; away from the center of the body or in a jerky or twisting manner?
- Work Postures
 - Is the back is curved too much or in a stooped position?
 - Is the back is twisted during movements?
 - Is the neck bent or twisted?

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- Are the arms away from the body?
- Are the wrists flexed, extended or pinched positions?
- Repetitive Use of Similar Muscles
 - Do employees perform movements over and over in the same way
- Static Muscle Use and Duration
 - Do employees hold any of the above work postures for > 20 sec.?
 - Stand for long periods with their knees locked?
 - Stand in one position without moving or stretching?
- Contact Stress
 - Do employees put localized pressure on any part of their body?
- Environmental Conditions
 - Are employees exposed to poor lighting, vibration, cold or hot air/wind/water?

Work Controls

NC Sturgeon must ensure based on the assessment, implement control measures to eliminate, minimize or reduce, so far as is reasonably practicable, the risk of musculoskeletal injury to the worker.

Handling Heavy or Awkward Loads

NC Sturgeon will take all practicable means to adapt the heavy or awkward loads to facilitate lifting, holding or transporting by workers or to otherwise minimize the manual handling required. Those include:

- Where use of lifting equipment is impractical or not possible, two man lifts must be used.
- All loads carried on handcarts shall be secured.
- All awkward type loads shall be secured to prevent tippage.
- Additional methods include:
 - reducing the weight of the load by dividing it into two or more manageable loads
 - increasing the weight of the load so that no worker can handle it and therefore mechanical assistance is required
 - reducing the capacity of the container
 - reducing the distance the load must be held away from the body by reducing the size of the packaging
 - providing hand holds
 - team lift the object with two or more workers
 - improve the layout of the work process to minimize the need to move materials
 - reorganize the work method(s) to eliminate or reduce repeated handling of the same object
 - rotate workers to jobs with light or no manual handling

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- use mobile storage racks to avoid unnecessary loading and unloading.

Incidents and Injuries

If an employee reports symptoms of a MSI NC Sturgeon will:

- Musculoskeletal injuries caused by improper lifting must be investigated and documented. Incorporation of investigation findings into work procedures must be accomplished to prevent future injuries.
- Injuries must be recorded and reported as required by 29 CFR Part 1904.

Review & Updating Lifting and Handling Loads Program

- Supervision must periodically evaluate work areas and employees' work techniques to assess the potential for and prevention of injuries. New operations should be evaluated to engineer out hazards before work processes are implemented.

Training

NC Sturgeon shall ensure that a worker who may be exposed to the possibility of musculoskeletal injury is trained in specific measures to eliminate or reduce that possibility. Our training shall include:

- General principles of ergonomics,
- Recognition of hazards and injuries,
- Procedures for reporting hazardous conditions, and
- Methods and procedures for early reporting of injuries.

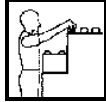
Additionally, job specific training will be given on safe lifting and work practices, hazards, and controls.

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MSD Hazard Identification Form

Job Title: _____ Location of Assessment: _____
 Task Assignment: _____ Hazard Identification applies to the following locations: _____
 Job Code (if used): _____ Date: _____
 Location: _____ Completed by (Name/Title): _____
 In Consultation with: _____

Status: Draft ☐ Final ☐

1. Awkward Postures			Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Neck	Working with the neck bent forward or to the side more than 30° for more than 2 hours total per day.	 Side ☐  Forward ☐	☐			☐ Date: _____
Neck	Working with the neck rotated more than 45° in either direction for more than 4 hours total per day or working with the neck bent back /up more than 10° for more than 2 hours total per day		☐			☐ Date: _____
Neck	Working with the elbow(s) at or above the shoulder for more than 2 hours total per day		☐			☐ Date: _____

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1. Awkward Postures			Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Shoulder	Working while sitting or standing with the back bent forward, sideways, or twisted more than 30° for more than 2 hours total per day	 Side ☐  Twisted ☐  Forward ☐	☐			☐ Date: _____
Back	Working while sitting or standing with the back bent back more than 10°, and with no support for the back, for more than 2 hours total per day	 Backward	☐			☐ Date: _____
Knees	Employee squats/ kneels for more than 2 hours total per day	 Kneel	☐			☐ Date: _____

2. Static Whole Body Postures		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Prolonged Sitting	Employee sits for more than 6 hours total per day	☐			☐ Date: _____
Prolonged Standing	Employee stands on hard surface more than 4 hours total per day (standing in one location without taking > 2 steps in any direction)	☐			☐ Date: _____

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3a. Lift/Lower Forces (manual labor)		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/ Shoulder	Lift/lower objects up to 2 times an hour Object close to the body: 35 lb or more Object away from the body: 17 lb or more	☐			☐ Date: _____
	Lift/lower objects 3 to 60 times an hour Object close to the body: 30 lb or more Object away from the body: 15 lb or more	☐			☐ Date: _____
	Lift/lower objects 61 to 240 times an hour Object close to the body: 25 lb or more Object away from the body: 15 lb or more	☐			☐ Date: _____
	Lift/lower objects >5 lb more than 240 times an hour (more than 4 times a minute)	☐			☐ Date: _____

3b. Lift/Lower Forces (office work)		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/ Shoulder	Lift/lower objects up to 2 times an hour - Object close to the body: 30 lb or more - Object away from the body: 15 lb or more	☐			☐ Date: _____
	Lift/lower objects 3 to 60 times an hour - Object close to the body: 25 lb or more - Object away from the body: 15 lb or more	☐			☐ Date: _____
	Lift/lower objects 61 to 240 times an hour - Object close to the body: 25 lb or more - Object away from the body: 10 lb or more	☐			☐ Date: _____
	Lift/lower objects >5 lb more than 240 times an hour (more than 4 times a minute)	☐			☐ Date: _____

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4a. Push/Pull Forces (manual labor) (Carts, trolleys, rolls, cables, etc.) <i>NOTE: Push/Pull force is the force required to move the object, not the weight of the object itself.</i>		Mark if required	• List task(s) requiring this posture • What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/Shoulder	Pushing/pulling up to 2 times an hour with initial push/pull force of more than 50 lb	☐			☐ Date: _____
	Pushing/pulling 3 to 120 times an hour, with initial push/pull force of more than 25 lb	☐			☐ Date: _____
	Pushing/pulling forces >5 lb more than 120 times an hour (more than twice a minute)	☐			☐ Date: _____
4b. Push/Pull Forces (office work) (Carts, trolleys, rolls, cables, etc.) <i>NOTE: Push/Pull force is the force required to move the object, not the weight of the object itself.</i>		Mark if required	• List task(s) requiring this posture • What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Back/Shoulder	Pushing/pulling up to 2 times an hour with initial push/pull force of more than 50 lb	☐			☐ Date: _____
	Pushing/pulling 3 to 120 times an hour , with initial push/pull force of more than 25 lb	☐			☐ Date: _____
	Pushing/pulling forces >5 lb more than 120 times an hour (more than twice a minute)	☐			☐ Date: _____

5. Repetition		Mark if required	• List task(s) requiring this posture • What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Neck, shoulders, elbows, wrists or hands	employee repeats the same motion with the neck, shoulders, elbows, wrists, or hands every few seconds with little or no variation for more than 2 hours total per day excluding computer use. Check body part(s) that apply: ☐ Neck ☐ Shoulder(s) ☐ Elbow(s) ☐ Wrist(s) ☐ Hand(s)	☐			☐ Date: _____
Computer Use	Employee uses computer more than 3 hours total per day	☐			☐ Date: _____

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6. Hand/Arm Vibration		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Hands Arms	Use high vibration tools (impact wrenches, chain saws, jack hammers, riveting hammers) for more than 30 minutes total per day	☐			☐ Date: _____
	Use moderate vibration hand tools (grinders, sanders, jig saws) that typically have moderate vibration levels more than 2 hours total per day	☐			☐ Date: _____

7. Repeated Impacts		Mark if required	- List task(s) requiring this posture - What is the possible cause of the posture?	List possible control measure(s) and state if control measures have been implemented	Hazard Resolved
Hands Knees	Employee uses one of the following as a hammer more than 10 times per hour and for more than 2 hours total per day. (Check the body part(s) that apply) ☐ Hand (heel/base of palm), or ☐ Knee	☐			☐ Date: _____

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Complete this section only if potential hazards have been identified in the “Mark if required” column:

- How many employees are exposed to the hazards identified above and how often?

	# of employees Exposed	How often? (describe in hours per day or week, as appropriate)
Awkward postures		
Static whole body postures		
Lift/lower forces		
Push/pull forces		
Repetition		
Hand/arm vibration		
Repeated impacts		

- In the past two years, how many MSD incidents been reported among employees who are exposed to the identified hazards? State the number of incidents and their nature (e.g., Lost Time, Medical Aid, First Aid, Incident only)

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Purpose

The purpose of this program is to set forth procedures for the safe use of electrical equipment, tools, and to comply with NFPA 70E requirements.

Scope

This program applies to all NC Sturgeon employees, temporary employees, and contractors. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers NC Sturgeon employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

NC Sturgeon shall advise the host employer of:

- Any unique hazards presented by the contract employer's work,
- Any unanticipated hazards found during work by NC Sturgeon that the host employer did not mention, and
- The measures NC Sturgeon took to correct any hazards reported by the host employer to prevent such hazards from recurring in the future.

Responsibilities

Managers/Supervisor

The HSE Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations. Unqualified persons shall not be permitted to enter spaces that are required to be accessible to qualified employees only, unless the electric conductors and equipment involved are in an electrically safe work condition.

Operations Managers and Supervisors shall ensure a documented job briefing is held before starting each job and will include all employees involved. The briefing will cover hazards associated with the job, work procedures involved, special precautions, energy source controls and PPE requirements.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees shall be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

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Safe Work Practices

Prior to any work being done within the Limited Approach Boundary a hazard risk analysis shall be performed. The analysis shall contain event severity, frequency, probability and avoidance to determine the level of safe practices employed.

Safe Work Practices for Working within the Limited Approach Boundary

The limited approach boundary is the distance from an exposed live part within which a shock hazard exists.

The restricted approach boundary is the closest distance to exposed live parts a qualified person can approach with without proper PPE and tools. Inside this boundary, accidental movement can put a part of the body or conductive tools in contact with live parts or inside the prohibited approach boundary. To cross the restricted approach boundary, the qualified person must:

- Have an energized work permit that is approved by the supervisor or manager responsible or the safety plan.
- Use PPE suitable for working near exposed live parts and rated for the voltage and energy level involved.
- Be certain that no part of the body enters the prohibited space.
- Minimize the risk from unintended movement, by keeping as much of the body as possible out of the restricted space; body parts in the restricted space should be protected.

The prohibited approach boundary is the minimum approach distance to exposed live parts to prevent flashover or arcing. Approaching any closer is comparable to making direct contact with a live part. To cross the prohibited approach boundary, the qualified person must:

- Have specified training to work on exposed live parts.
- Have a permit with proper written work procedures and justifying the need to work that close.
- Do a risk analysis.
- Have (2) and (3) approved by the appropriate supervisor.
- Use PPE appropriate for working near exposed live parts and rated for the voltage and energy level involved.

The Flash Protection Boundary is the approach limit at a distance from exposed live parts within which a person could receive a second degree burn if an electrical arc flash were to occur.

- Use PPE appropriate for working near exposed live parts and rated for the voltage and energy level involved.
- For systems of 600 volts and less, the flash protection boundary is 4 feet, based on an available bolted fault current of 50 kA and a clearing time of 6 cycles for the circuit breaker to act, or any combination of fault currents and clearing times not exceeding 300 kA cycles.
- When working on de-energized parts and inside the flash protection boundary for nearby live exposed parts - If the parts cannot be de-energized, use barriers such as insulated blankets to protect against accidental contact or wear proper PPE.

Arc Flash Hazard Analysis

An arc flash hazard analysis includes the following:

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- Collect data on the facility's power distribution system.
 - Arrangement of components on a one-line drawing with nameplate specifications of every device.
 - Lengths and cross-section area of all cables.
- Contact the electric utility for information including the minimum and maximum fault currents that can be expected at the entrance to the facility.
- Conduct a short circuit analysis followed by a coordination study is performed.
- Feed the resultant data into the NFPA 70E equations.
 - These equations produce the necessary flash protection boundary distances and incident energy to determine the minimum PPE requirement.
 - The flash protection boundary is the distance at which PPE is needed to prevent incurable burns (2nd degree or worse) if an arc flash occurs. (It is still possible to suffer 1st or 2nd degree burns.)
- For systems of 600 volts and less, the flash protection boundary is 4 feet, based on an available bolted fault current of 50 kA (kiloamps) and a clearing time of 6 cycles (0.1 seconds) for the circuit breaker to act, or any combination of fault currents and clearing times not exceeding 300 kA cycles (5000 ampere seconds).

When working on de-energized the parts, but still inside the flash protection boundary for nearby live exposed parts:

- If the parts cannot be de-energized, barriers such as insulated blankets must be used to protect against accidental contact or PPE must be worn.
- Employees shall not reach blindly into areas that might contain exposed live parts.
- Employees shall not enter spaces containing live parts unless illumination is provided that allows the work to be performed safely.
- Conductive articles of jewellery and clothing (such as watchbands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread, metal headgear, or metal frame glasses) shall not be worn where they present an electrical contact hazard with exposed live parts.
- Conductive materials, tools, and equipment that are in contact with any part of an employee's body shall be handled in a manner that prevents accidental contact with live parts. Such materials and equipment include, but are not limited to long conductive objects such as ducts, pipes, tubes, conductive hose and rope, metal-lined rules and scales, steel tapes, pulling lines, metal scaffold parts, structural members, and chains.
- When an employee works in a confined space or enclosed spaces (such as a manhole or vault) that contains exposed live parts, the employee shall use protective shields, barriers or insulating materials as necessary to avoid contact with these parts. Doors, hinged panels, and the like shall be secured to prevent them from swinging into employees. Refer to the confined space entry program.

Inspections

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.
- Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

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Equipment

Test instruments, equipment, and their accessories shall meet the requirements of ANSI/ISA-61010-1-Safety Requirements for Electrical Equipment for Measurement, Control, and Laboratory Use Part 1 General Requirements, for rating and design requirements for voltage measurement and test instruments intended for use on electrical systems 1000 Volts and below.

When test instruments are used for the testing for the absence of voltage on conductors or circuit parts operating at 50 volts or more, the operation of the test instrument shall be verified before and after an absence of voltage test is performed.

Personal Protective Equipment

All insulating PPE must be inspected before each day's use and immediately following any incident that can reasonably be suspected of having caused damage. Insulating gloves shall be given an air test, along with the inspection.

Maximum test intervals for rubber insulating personal protective equipment shall include:

- Blankets-before first issue/every 12 months thereafter
- Gloves-before first issue and every 6 months
- Sleevs before first issue and every 12 months
- Covers and line hose shall be testing if insulating value is suspect.

Energized Electrical Work Permit

Work on energized electrical conductors or circuit parts that are not placed in an electrically safe work condition shall be considered energized electrical work and shall be performed by written permit only.

Lighting

Employees shall not enter spaces containing electrical hazards unless illumination is provided that enables the employees to perform the work safely. Where lack of illumination or an obstruction precludes observation of the work to be performed employees shall not perform any task within the Limited Approach Boundary of energized electrical conductors or circuit parts operating at 50 volts or more or where an electrical hazard exists.

Extension Cords

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.

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- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
 - All extension cords shall be plugged into one of the following:
 - A GFCI outlet;
 - A GFCI built into the cord;
 - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be remove from service and repaired or replaced.
- Extension cords shall not be used on compressor skid to operated heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment shall be hard wired per applicable electrical codes.

Outlets

- Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

Multiple Outlet Boxes

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

Double Insulated Tools

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

Switches, circuit breakers, and disconnects

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labelled with the voltage rating.
- Each breaker within a breaker panel must be labelled for the service it provides.
- Disconnect switches providing power for individual equipment must be labelled accordingly.

Ladders

- Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of fiberglass, or have non-conductive side rails.
- When using ladders they shall be free from any moisture, oils, and greases.

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Energized and Overhead High Voltage Power Lines & Equipment

- A minimum clearance of 10 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines shall be de-energized and grounded or other protective measures shall be provided before work is started.
- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.
- Minimum approach distance for qualified employees shall be followed per 29 CFR 1910.333(c)(3)(i) Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current).

Confined or Enclosed Work Spaces

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee shall isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

Enclosures, Breaker Panels, and Distribution Rooms

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures shall be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have “Danger: High Voltage – Authorized Personnel Only” posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

Lock Out/Tag Out

- No work shall be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with the live parts) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out shall be treated as live parts.
- Per Maddox Services policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using Maddox Services Control of Hazardous Energy – Lock Out/Tag Out Program. Lockouts are performed by each employee doing the job. Only certified electricians may work on electric circuit parts or equipment.

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- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow NC Sturgeon Control of Hazardous Energy – Lock out/Tag Out Program.
- Authorized personnel will be trained in lock out/tag out procedures.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

Contractors

- Only approved, certified, electrical contractors may perform construction and service work on NC Sturgeon or client property.
- It is the Manager/Supervisors responsibility to verify the contractor's certification.

Fire Extinguishers

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

Electric Shock-CPR:

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

Electric Welders

- A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.
- A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

Equipment Grounding

- All gas compressors, air compressors, separators, vessels, etc. shall be grounded by means of using a lug and ground strap, nominal in size to a ½" bolt or larger, attached to a ground rod six feet or longer.
- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

Training

Employees are trained to understand the specific hazards associated with electrical energy. Employees shall be trained in safety-related work practices and procedural requirements as necessary to provide protection from the electrical hazards associated with their respective jobs. Employees shall be trained to identify and understand the relationship between electrical hazards and possible injury.

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Employees shall be trained in the skills and techniques to distinguish exposed energized electrical conductors and circuit parts from other parts of electrical equipment, to determine the nominal voltage of exposed energized electrical conductors and circuit parts, the approach distances specified in Table 130.2 (below), and the decision making process necessary to determine the degree and extent of the hazard and the personal protective equipment and job planning necessary to perform the task safely.

Limited Approach Boundary				
Nominal system voltage range, phase to phase	Exposed movable conductor	Exposed fixed-circuit part	Restricted approach boundary (allowing for accidental movement)	Prohibited approach boundary
0 to 50 volts	Not specified	Not specified	Not specified	Not specified
51 to 300 volts	10 ft. 0 in.	3 ft. 6 in.	Avoid contact	Avoid contact
301 to 750 volts	10 ft. 0 in.	3 ft. 6 in.	1 ft. 0 in.	0 ft. 1 in.
751 to 15 KV KV	10 ft. 0 in.	5 ft. 0 in.	2 ft. 2 in.	0 ft. 7 in.
15.1 kV to 36 KV	10 ft. 0 in.	6 ft. 0 in.	2 ft. 7 in.	0 ft. 10 in.
36.1 KV to 46 kV	10 ft. 0 in.	8 ft. 0 in.	2 ft. 9 in.	1 ft. 5 in.
46.1 KV to 72.5 KV	10 ft. 0 in.	8 ft. 0 in.	3 ft. 2 in.	2 ft. 1 in.
72.6 KV to 121 KV	10 ft. 8 in.	8 ft. 0 in.	3 ft. 3 in.	2 ft. 8 in.
138 to 145	11 ft 0 in	10 ft. 0 in.	3 ft. 7 in	3 ft. 1 in.
161 KV to 169 KV	11 ft 8 in.	11 ft. 8 in.	4 ft. 0 in.	3 ft. 6 in.
230 KV to 242 KV	13 ft. 0 in.	13 ft. 0 in.	5 ft. 3 in.	4 ft. 9 in.
345 KV to 262 KV	15 ft. 4 in	15 ft. 4 in.	8ft. 6 in.	8 ft. 0 in.

Employees shall be trained in safety related work practices that pertain to their respective job assignments.

Safe work practices shall be employed to prevent electric shock or other injuries resulting for either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

Training shall be documented and maintained for the duration of the employee's employment. Documentation shall be made when the employee demonstrates proficiency, be maintained for the duration of the employee's employment, and contain each employee's name and date of training.

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Purpose

The purpose of the Personal Protective Equipment section is to set forth the procedures for the use, care, and maintenance of personal protective equipment required to be used by employees for the prevention of injuries.

Scope

Applies to all **NC Sturgeon** employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Key Responsibilities

HSE Manager

- Assists in the selection of appropriate PPE. If a task exposes an employee to hazards which cannot be eliminated through engineering or administrative controls, the HSE Manager assists the supervisor and project manager to identify and select PPE suitable for the specific task performed, conditions present, and frequency and duration of exposure. Employees need to give feedback to the supervisor about the fit, comfort, and suitability of the PPE being selected. Employees are provided reasons for selection of PPE.
- Assists supervisor and site managers in assuring all PPE obtained meets regulatory and this procedure's requirements.
- Performs Worksite Hazard Assessments - The hazard assessment must indicate a determination if hazards are present or are likely to be present, which necessitate the use of PPE. Sources of hazards include, but are not limited to: hazards from impact/motion, high/low temperatures, chemicals, materials, radiation, falling objects, sharp objects, rolling or pinching objects, electrical hazards, and workplace layout. Certifies in writing the tasks evaluated, hazards found and PPE required to protect employees against hazards and ensures exposed employees are made aware of hazards and required PPE before they are assigned to the hazardous task. Certificate shall include certifier's name, signature, dates and identification of assessment documents.

Managers and Supervisors

- Supervisors and managers shall regularly monitor employees for correct use and care of PPE, and obtain follow-up training if required to ensure each employee has adequate skill, knowledge, and ability to use PPE.
- Supervisors and managers shall enforce PPE safety rules following the guidance of the **NC Sturgeon** progressive disciplinary procedures and ensure Required PPE Poster is posted properly.

Employees

- Complying with the correct use and care of PPE.
- Reporting changes in exposure to hazardous conditions that might require a follow-up assessment of the task for PPE.
- Reporting and replacing defective or damaged PPE, which shall not be used.
- Wearing of required PPE is a condition of employment.

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Procedure

General

Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical 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 equipment is NOT permitted, except for safety toe footwear and prescription safety glasses. **NC Sturgeon** is still responsible for the assurance of its adequacy, maintenance and sanitation of those two items.

All PPE issued shall be at no cost to the employee. All employees will know and follow the procedures outlined in this Program.

Eye Protection

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids or chemical gases or vapours. Eye and Face PPE must comply with ANSI Standard Z87.1-2003 (Z87+), *Occupational and Educational Personal Eye and Face Protective Devices*.

Safety Glasses

Safety glasses, with side shields, that meet ANSI Z-87.1-2003 standards with “high Impact lenses” are required to be worn by all employees, subcontractors, and visitors while on **NC Sturgeon** property, at all times, as described below:

- At field locations, in shops and warehouses, except in approved, designated, striped safety zones.
- In all yard work zones or by everyone when in the vicinity of loading or unloading equipment, performing mechanic or maintenance work, test stand operations, operating equipment such as forklifts, welding, or any type of work which has the potential to inflict an eye injury.
- In any office, restroom, or any other building while performing any type of work where a potential eye injury may be present.
- Visitors will be provided with visitor glasses. In the absence of approved prescription safety glasses, “Over the glass” type safety glasses or goggles, must be worn over the nonsafety glasses until approved prescription safety glasses are obtained.
- Workers assisting welders must wear absorbent safety glasses that protect the wearer from ultra-violet (UV) and/or infrared rays (IR).
- Dark shaded lens (sunglasses) darker than a # 1 shade is prohibited to be worn indoors unless welding or assisting a welder.
- A doctor must support “exceptions for medical reasons” in writing to exempt safety eyewear requirements.
- Safety glasses are not required:
 - Inside offices.
 - Parking lots when traveling from vehicles to and from office buildings by way of main doors that do not pass through shops.

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Goggles

- Chemical splash proof goggles shall be worn when handling or mixing liquid chemicals, solvents, paints, etc., and/or as recommended on the Material Safety Data Sheet of the material being handled.
- Dust proof goggles shall be worn when blowing equipment down with air or while performing other jobs where safety glasses are not adequate to prevent airborne particles from entering the openings around the lenses and side shields.

Face Shields

- Full face shields shall be worn over safety glasses when operating hand held or stationery grinders with abrasive or wire wheels, while chipping paint or concrete or, performing jobs where there is the potential for flying objects striking the face and safety glasses or goggles would not provide adequate protection.

Head Protection

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from employee initiated impact or impact from falling or other moving objects. Helmets must comply with ANSI Standard Z89.1-1997 Class E, *American National Standard for Industrial Head Protection* for Type II head protection or be equally effective.

- Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects.
- Hardhats are to be worn at all field, shop and warehouse locations, or where deemed necessary as per each location's PPE Hazard Assessment.
- Hardhats will not be altered in any way.
- Do not paint or apply unauthorized stickers, name plates, etc.
- Do not drill, cut, bend, or apply heat.
- Do not alter the suspension system. H
- Hardhats will be inspected by the employee regularly for cracks, chips, scratches, signs of heat exposure (sun cracks), etc.
- Defective hardhats will be replaced immediately.
- Hardhats shall not be placed in rear windows of vehicles where they will be exposed to the sun or become projectiles during an accident.
- A supply of hardhats must be made available to visitors.
- **NC Sturgeon** shall provide hardhats.
- Employees will be trained in the use, care and maintenance of head protection equipment.

Hearing Protection

Hearing protection is required to be worn by all employees, subcontractors, and visitors while in posted "High Noise" areas. Refer to the **NC Sturgeon** Hearing Conservation Program for more information.

Warning signs will be posted in areas known or suspected to have noise levels exceeding 85 dBA either constantly or intermittently.

When signs are not posted, employees shall wear hearing protection when noise caused by machinery, tools, etc., prevents normal conversations to be heard clearly.

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Rule of thumb: If you have to yell to be heard, hearing protection is required

Types

- Molded Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hard hat mounted Earmuffs and earplugs shall be provided to the employee in sizes and configurations that will be comfortable to the employee.

Care and Maintenance

- Inspect hearing protection prior to each use.
- Hearing protection must be kept clean to prevent ear infections.
- Most earplugs used today are disposable and must be discarded when they become dirty, greasy, or cracked.
- Earmuffs that have deteriorated foam inserts, cracked seals or are defective must be replaced.

Fit

- Due to individual differences, not everyone can wear the same type of hearing protection. A variety of styles may have to be tried before one is found to be comfortable and provide adequate protection.
- Employees shall be instructed how to obtain the proper fit.

Hand Protection

Gloves

- Gloves are required to be worn when performing work, which may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals.
- Welding: Welding gloves made of leather or other heat resistant materials shall be worn when performing arc welding or oxy/gas cutting.
- Chemical: Impervious (chemical resistant) gloves shall be worn when handling chemicals that specify gloves as personal protection equipment when handling.
- Refer to the specific chemical's Material Safety Data Sheet for the correct glove type.
- Persons assigned to working with chemicals, i.e., solvent vats, shall be issued their own individual gloves for hygiene purposes.
- Leather: Leather gloves should be worn when working with sharp materials or when handling rigging equipment.
- Cloth: Cloth gloves should be worn when handling objects or materials, which could cause blisters, splinters, cuts, etc.
- Heat Resistant: Heat resistant gloves shall be worn when handling hot bearings, races, or other materials or objects that have been heated beyond ambient temperatures.
- Insulated: Insulated gloves shall be worn to prevent frostbite in extreme cold climates.
- Glove Inspections
 - Gloves shall be inspected before each use for holes, tears, and worn areas.
 - Chemical gloves shall be periodically air tested for pinholes by twisting the cuff tightly, apply low air pressure to expand the glove, and then submersing in water to check for bubbles.

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- Defective gloves shall be discarded immediately. Exception: machinists are exempted from wearing gloves while working with rotating machinery.

Foot Protection

Safety footwear shall be worn by all employees with regularly assigned duties at field locations, in shops and warehouses.

- Office workers and visitors who enter these areas on an infrequent basis will not be required to wear foot protection provided they stay clear of the work being performed.
- If required to be in the close proximity of the work, the work will be stopped while visiting the area or safety footwear will be worn.
- Shops, Field Locations, Warehouses and Parts Departments: Leather or equivalent boots, either lace up or pull up, shall be worn.
- The boot must provide ankle protection and have soles designed to protect from punctures with defined heels for climbing ladders.
- Metatarsal guards will be worn when duties present a hazard of equipment or material crushing the foot.
- All safety footwear must meet ANSI Z41-1999 standards.
- Client locations may require safety footwear to be worn by everyone; check with the local supervisor for client requirements before visiting field locations.

Fall Protection

Personal fall protection is required when performing certain elevated jobs in excess of six feet. Consult the **NC Sturgeon** Fall Protection Program.

Electrical Protection

Consult the **NC Sturgeon** Electrical Safety Program.

Worksite Hazard Assessment

A written hazard assessment shall be performed. During the hazard assessment a determination if hazards are present or are likely to be present, this necessitates the use of PPE. The following sample hazard sources will be identified:

- High or low temperatures; Chemical exposures (use MSDS for guidance)
- Flying particles, molten metal or other eye, face, or skin hazards
- Falling objects or potential for dropping objects; employee falling from a height of 6' or more
- Sharp objects; Rolling or pinching that could crush the hands or feet;
- Electrical hazards

Where these hazards could cause injury to employees, personal protective equipment must be selected to substantially eliminate the injury potential. Employees will be notified for the selection and reason.

The results of this assessment shall be communicated to each affected employee and kept at the local office.

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Selected/identified PPE shall be fitted to each affected employee. Fitting, including proper donning, doffing, clean and maintenance of PPE is addressed in the Training section. Exemptions for use of PPE must be supported by the PPE hazard assessment.

Monitoring

Supervisors and site managers monitor worksite tasks for changes in, or the introduction of new hazards. If new hazards are discovered, they advise the HSE Manager who then conducts a hazard assessment for appropriate PPE. The HSE Manager monitors the effectiveness of the PPE Procedure and makes recommendations to management to improve the procedure.

Training

Employees who require or may need to wear PPE shall be properly trained and PPE must be fitted to each affected employee. Training shall include:

- When PPE is necessary.
- What PPE is necessary.
- How to properly don, doff, adjust and wear PPE.
- The limitations of PPE.
- Useful life and disposal of PPE.
- How to clean and maintain PPE in a sanitary and reliable condition.
- Reporting and replacing defective or damaged PPE, which shall NOT be used.

Retraining

Retraining is required when:

- The workplace changes, making the previous training obsolete.
- The type of PPE changes.
- When the employee demonstrates lack of use, improper use, or insufficient skill or understanding in PPE selection, necessity, use and limitations.

Documentation

Training shall be documented and records kept at the local office. The training certification shall include:

- Name of employee(s) trained;
- The dates of training; and
- The certification subject.

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SUBJECT TO CHANGE BASED ON INDIVIDUAL WORKSITE HAZARD ASSESSMENT **CHANGE ALL AS NEEDED**

[illegible]

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PPE Hazard Assessment Certification Form

Name of work place: _____

Work place address: _____

Work area(s): _____

Conducted by Name/Signature: _____

Date of assessment: _____

Job/Task(s): _____

(Use a separate sheet for each job/task or work area)

EYES		
<u>Work activities, such as:</u> ☐ abrasive blasting ☐ chopping ☐ cutting ☐ drilling ☐ welding ☐ soldering ☐ torch brazing ☐ working outdoors ☐ computer work ☐ punch press operations ☐ other:	<u>Work-related exposure to:</u> ☐ airborne dust ☐ dirt ☐ UV ☐ flying particles/objects ☐ blood splashes ☐ hazardous liquid chemicals mists ☐ chemical splashes ☐ molten metal splashes ☐ glare/high intensity lights ☐ laser operations ☐ intense light ☐ hot sparks ☐ other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐ <u>If no, use:</u> ☐ Safety glasses ☐ Safety goggles ☐ Dust-tight goggles ☐ Impact goggles ☐ Welding helmet/shield ☐ Chemical goggles ☐ Chemical splash goggles ☐ Laser goggles ☐ Shading/Filter (# _____) ☐ Welding shield ☐ Other:
FACE		
<u>Work activities, such as:</u> ☐ cleaning ☐ cooking ☐ siphoning ☐ painting ☐ dip tank operations ☐ metal pouring ☐ other:	<u>Work-related exposure to:</u> ☐ hazardous liquid chemicals ☐ extreme heat ☐ extreme cold ☐ potential irritants: ☐ other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐ <u>If no, use:</u> ☐ Face shield ☐ Shading/Filter (# _____) ☐ Welding shield ☐ Other:

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HEAD		
<u>Work activities, such as:</u> ☐ building maintenance ☐ confined space operations ☐ construction ☐ electrical wiring ☐ walking/working under catwalks ☐ walking/working on catwalks ☐ walking/working under conveyor belts ☐ working with/around conveyor belts ☐ walking/working under crane loads ☐ other:	<u>Work-related exposure to:</u> ☐ beams ☐ pipes ☐ exposed electrical wiring or components ☐ falling objects ☐ fixed object ☐ machine parts ☐ other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐ <u>If no, use:</u> ☐ Protective Helmet ☐ Type A (low voltage) ☐ Type B (high voltage) ☐ Type C ☐ Bump cap (not ANSI-approved) ☐ Hair net or soft cap ☐ Other:
HANDS/ARMS		
<u>Work activities, such as:</u> ☐ baking ☐ cooking ☐ grinding ☐ welding ☐ working with glass ☐ using power tools ☐ using computers ☐ working outdoors ☐ using knives ☐ dental and health care services ☐ garbage disposal ☐ computer work ☐ other:	<u>Work-related exposure to:</u> ☐ blood ☐ irritating chemicals ☐ tools or materials that could scrape or cut ☐ extreme heat ☐ extreme cold ☐ animal bites ☐ electric shock ☐ vibration ☐ musculoskeletal disorders ☐ sharps injury ☐ other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐ <u>If no, use:</u> ☐ Gloves ☐ Chemical resistance ☐ Liquid/leak resistance ☐ Temperature resistance ☐ Abrasion/cut resistance ☐ Slip resistance ☐ Latex or nitrile ☐ Anti-vibration ☐ Protective sleeves ☐ Ergonomic equipment _____ ☐ Other:

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FEET/LEGS		
<u>Work activities, such as:</u> ☐ building maintenance ☐ construction ☐ demolition ☐ food processing ☐ foundry work ☐ working outdoors ☐ logging ☐ plumbing ☐ trenching ☐ use of highly flammable materials ☐ welding ☐ other:	<u>Work-related exposure to:</u> ☐ explosive atmospheres ☐ explosives ☐ exposed electrical wiring or components ☐ heavy equipment ☐ slippery surfaces ☐ impact from objects ☐ pinch points ☐ crushing ☐ slippery/wet surface ☐ sharps injury ☐ blood ☐ chemical splash ☐ chemical penetration ☐ extreme heat/cold ☐ fall ☐ other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐ <u>If no, use:</u> ☐ Safety shoes or boots ☐ Toe protection ☐ Electrical protection ☐ Heat/cold protection ☐ Puncture resistance ☐ Chemical resistance ☐ Anti-slip soles ☐ Leggings or chaps ☐ Foot-Leg guards ☐ Other:
BODY/SKIN		
<u>Work activities such as:</u> ☐ baking or frying ☐ battery charging ☐ dip tank operations ☐ fiberglass installation ☐ sawing ☐ other:	<u>Work-related exposure to:</u> ☐ chemical splashes ☐ extreme heat ☐ extreme cold ☐ sharp or rough edges ☐ irritating chemicals ☐ other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐ <u>If no, use:</u> ☐ Vest, Jacket ☐ Coveralls, Body suit ☐ Raingear ☐ Apron ☐ Welding leathers ☐ Abrasion/cut resistance ☐ Other:
<u>With:</u> ☐ Long sleeves		

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BODY/WHOLE		
<u>Work activities such as:</u> ☐ building maintenance ☐ construction ☐ logging ☐ computer work ☐ working outdoors ☐ utility work ☐ other:	<u>Work-related exposure to:</u> ☐ working from heights of 10 feet or more ☐ impact from flying objects ☐ impact from moving vehicles ☐ sharps injury ☐ blood ☐ electrical/static discharge ☐ hot metal ☐ musculoskeletal disorders ☐ sparks ☐ chemicals ☐ extreme heat/cold ☐ elevated walking/working surface ☐ working near water ☐ injury from slip/trip/fall ☐ other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐ <u>If no, use:</u> <u>With:</u> ☐ Fall Arrest/Restraint ☐ Hood ☐ Traffic vest ☐ Full sleeves ☐ Static coats/overalls ☐ Flame resistant jacket/pants ☐ Insulated jacket ☐ Cut resistant sleeves/wristlets ☐ Hoists/lifts ☐ ergonomic equipment: _____ ☐ Other:
LUNGS/RESPIRATORY		
<u>Work activities such as:</u> ☐ cleaning ☐ mixing ☐ painting ☐ fiberglass installation ☐ compressed air or gas operations ☐ confined space work ☐ floor installation ☐ ceiling repair ☐ working outdoors ☐ other:	<u>Work-related exposure to:</u> ☐ dust or particulate ☐ toxic gas/vapor ☐ chemical irritants (acids) ☐ welding fume ☐ asbestos ☐ pesticides ☐ organic vapors ☐ oxygen deficient environment ☐ paint spray ☐ extreme heat/cold ☐ other:	<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐ <u>If no, use:</u> <u>With/Type:</u> ☐ Dust mask ☐ Disposable particulate respirator ☐ Replaceable filter particulate w/cartridge _____ ☐ half faced ☐ full face ☐ PAPR (Air recycle) ☐ PPSA (Air supply)

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EARS/HEARING		
<u>Work activities such as:</u> ☐ generator ☐ ventilation fans ☐ motors ☐ sanding ☐ pneumatic equipment ☐ punch or brake presses ☐ use of conveyors ☐ other:	☐ grinding ☐ machining ☐ routers ☐ sawing ☐ sparks	<u>Work-related exposure to:</u> ☐ loud noises ☐ loud work environment ☐ noisy machines/tools ☐ punch or brake presses ☐ other:
<u>Can hazard be eliminated without the use of PPE?</u> Yes ☐ No ☐		
<u>If no, use:</u> ☐ ear muffs ☐ ear plugs ☐ leather welding hood		

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The purpose of Process Safety Management is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries.

NC Sturgeon is required to recognize and participate as a contract employer at client locations with PSM Programs in place. **NC Sturgeon** as a contractor has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows:

- **NC Sturgeon** shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.
- **NC Sturgeon** shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.
- **NC Sturgeon** shall document that each contract employee has received and understood the training required by this paragraph. **NC Sturgeon** shall prepare a record, which contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training.
- **NC Sturgeon** shall assure that each contract employee follows the safety rules of the facility including the safe work practices required with 1910.119(f)(4).
- **NC Sturgeon** shall advise the employer of any unique hazards presented by **NC Sturgeon's** work, or of any hazards found by **NC Sturgeon's** work.
- **NC Sturgeon** will assure that trade secret information will be kept in confidence as process safety information is released to them.

Process Safety Information

NC Sturgeon employees shall participate in all as directed client PSM requirements, including:

- | | |
|------------------------------------|----------------------------------|
| • Employee Participation; | Process Safety Information (PSI) |
| • Process Hazards Analysis (PHA) | Operating Procedures |
| • Training | Contractors |
| • Pre-Startup Safety Review (PSSR) | Mechanical Integrity |
| • Hot Work Permits | Management of Change (MOC) |
| • Incident Investigation | Emergency Planning and Response |
| • Compliance Audits | Trade Secrets |

NC Sturgeon Duties

NC Sturgeon, as a contract employer shall ensure its employees abide by employers safe work practices during operations such as lockout/tagout; confined space entry; opening process equipment or piping; hot work; and control over entrance into a facility. These safe work practices shall apply to client employees and contractor employees. To comply with 1910.119(f)(4) **NC Sturgeon** employees are required to complete all required documentation for any permit-required activities.

NC Sturgeon shall not perform hot work until a hot work permit is obtained from the client. The permit shall document that the fire prevention and protection requirements (CFR 1910.252(a)) have been implemented prior to beginning the hot work operations.

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NC Sturgeon employees must immediately report all accidents, injuries and near misses. An incident investigation shall be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained 5 years.

In the event **NC Sturgeon** becomes the sole operator of a facility, the existing PSM Program for that facility may be amended and adopted or, in the absence of a PSM Program, an assessment will be required prior to assuming operating responsibilities.

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Purpose

It is the intention of **NC Sturgeon** to provide a respirator protection program that meets or exceeds all federal standards. **NC Sturgeon** will attempt to engineer potential harmful vapors and oxygen deficient atmosphere exposure hazards out of the work environment. If engineering control measures are not feasible or during emergency situations with high exposure then respirators shall be provided which are applicable and suitable for purpose intended.

Scope

This program applies to all **NC Sturgeon** projects and operations.

Respiratory Program Administrator

Overall responsibility for the respiratory protection program is assigned to the **NC Sturgeon** Safety Manager in order to ensure that specific requirements are followed.

The Administrator must be knowledgeable of the complexity of the program, able to conduct evaluations and have the proper training.

This assignment is made, however, with the understanding that individual supervisors will have to implement and enforce major portions of the program. It is understood that the Program Administrator will report performance problems to the appropriate manager for resolution. The person who will have responsibility for administering all the aspects of this program will be the Project Manager or their designee.

The responsibilities of the Program Administrator will include, but are not limited to:

- Conducting an annual written evaluation of the program. The program evaluation should be completed no later than December, 31, of each year.
- Ensuring an adequate supply of respirators, cartridges, and repair/replacement parts. The Program Administrator may delegate this duty but will retain overall responsibility. The person(s) to whom this duty has been delegated is the Project Manager and/or Field Supervisor.
- Identifying hazards and ensuring only NIOSH certified respirators must be selected and provided based on those hazards and factors affecting performance.
- Ensuring that all respirator users have been trained in the use, selection and limitations of the type of respirators they will be using prior to the first time the respirator must be used. While the duty of conducting the training may be delegated, the Program Administrator retains final responsibility for seeing that all employees are appropriately trained.
- Ensuring that all respirator users have been medically evaluated and found fit to use the type of respirators that will be required in their job. The medical evaluation must be completed prior to assigning any employee to a task that requires use of a respirator.
- Ensuring that all respirator users are fit-tested at least annually and more often if other federal requirements apply.

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- Ensuring that respirators are individually issued, are cleaned and sanitized on a regular basis, and respirators are stored in a clean and accessible location. This duty may also be delegated but the Program Administrator retains final responsibility for seeing that it is done.
- Ensuring that respirators are selected based on the hazard that will be encountered. This program describes the basic respirators that will be used at this site and the tasks for which they will be required. In special circumstances, the Program Administrator will contact the corporate health and safety staff for guidance in selecting the correct respirator.
- Ensuring that employee exposure is monitored to assure correct respirator type is used. Exposure monitoring may be delegated to others; however, the Program Administrator has final responsibility of monitoring completion and to request assistance when necessary.
- Ensuring surveillance of employees who wear respirators shall leave the area to wash, change cartridges or if they detect break through or resistance.
- Ensuring that the elements of the Respiratory Protection Program for the selection, use, cleaning/maintenance, storage and fit-testing of respirators are followed.
- Ensuring that respirator parts are not exchanged between brands of respirators.
- Ensuring medical evaluations, respirators and required training are provided at no cost to the employee.

Medical Requirements

General

NC Sturgeon shall provide a medical evaluation to determine the employee's ability to use a respirator, *before* the employee is fit tested or required to use the respirator in the workplace. **NC Sturgeon** may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

Medical Evaluation Procedures

NC Sturgeon shall identify a physician or other licensed health care professional (PLHCP) to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire. The medical evaluation shall obtain the information requested by the Medical Questionnaire in Forms section (or equivalent).

The medical evaluation prior to fit-testing will be confidential, conducted during normal working hours, be at a convenient time and location, be understandable and the employee will be given a chance to discuss the results with the PLHCP.

Supplemental Information for the PLHCP

The following information must be provided to the PLHCP before the PLHCP makes a recommendation concerning an employee's ability to use a respirator:

- The type and weight of the respirator to be used by the employee;
- The duration and frequency of respirator use (including use for rescue and escape);
- The expected physical work effort;
- Additional protective clothing and equipment to be worn; and
- Temperature and humidity extremes that may be encountered.

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NC Sturgeon shall provide the PLHCP with a copy of the **NC Sturgeon** Respiratory Protection Program.

Note: When **NC Sturgeon** replaces a PLHCP, **NC Sturgeon** must ensure that the new PLHCP obtains this information, either by providing the documents directly to the PLHCP or having the documents transferred from the former PLHCP to the new PLHCP. However, OSHA does not expect employers to have employees medically re-evaluated solely because a new PLHCP has been selected.

Medical Determination

In determining the employee's ability to use a respirator, **NC Sturgeon** shall obtain a written recommendation regarding the employee's ability to use the respirator from the PLHCP. The recommendation shall provide only the following information:

- Any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

All recommendations are to be sent to **NC Sturgeon's** Safety Manager.

Additional Medical Evaluations

At a minimum, **NC Sturgeon** shall provide additional medical evaluations that comply with the requirements of this program if:

- An employee reports medical signs or symptoms that are related to ability to use a respirator;
- A PLHCP, supervisor, or the respirator Program Administrator informs **NC Sturgeon** that an employee needs to be re-evaluated;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, and temperature) that may result in a substantial increase in the physiological burden placed on an employee.

Work Site Procedures

Each work site where respirators are required to protect the health of the worker shall have work site procedures that follow the guidelines of this program. Specific procedures may also be required by our client which will be followed. The following areas shall be included:

- Identification of specific hazard requiring respiratory protection
- The selection of the appropriate respiratory protection equipment based on the specific hazard and concentration levels, characteristics, etc. Specific brand and models of respiratory equipment to be used shall be identified in the procedures.

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- Verification that each user of respiratory protection is qualified (medical approval, current fit test, annual training and demonstrates competency.

Respirator Selection Criteria

The selection of the respiratory equipment is based on the hazards the employee is exposed to. **NC Sturgeon** shall:

- Perform hazard identification,
- Select and provide respirators based on those hazards and factors affecting performance,
- Establish brands and models to be used, and
- Estimate exposures and contaminant information.

Hazard Identification

Due to the many varied work locations **NC Sturgeon's** identification of respiratory hazards will be contained in the various work site specific safety plans. However, common respiratory hazards that will be encountered include:

- Dust
- Fumes
- Gases
- Chemical particles
- Oxygen Deficiency

Characteristics of Hazardous Operation or Process

- Hot operations: welding, chemical reactions, soldering, melting, melding and burning
- Liquid operations: painting, degreasing, dipping, spraying, brushing, coating, etching, cleaning, pickling, plating, mixing, galvanizing and chemical reactions
- Solid operations: pouring, mixing, separations, extraction, crushing, conveying, loading, bagging and demolition.
- Pressurized spraying: cleaning parts, applying pesticides, degreasing, sand blasting and painting
- Shaping operations: cutting, grinding, filing, milling, melding, sawing and drilling

Gaseous Contaminants

- Inert gases (helium, argon, etc.), which do not metabolize in the body but displace air to produce an oxygen deficiency.
- Acid gases (SO₂, H₂S, HCl, etc.) which are acids or produce acids by reaction with water.
- Alkaline gases (NH₃, etc.), which are alkalies or produce alkalies by reaction with water.
- Organic gases (butane, acetone, etc.), which exist as true gases or vapours from organic liquids.
- Organometallic gases (tetraethyl lead, organo-phosphates, etc.), which have metals attached to organic groups.

Particulate contaminants

- Dusts are mechanically generated solid particulates (0.5 to 10µm)

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- Fumes are solid condensation particles of small diameter (0.1 to 1.0 µm)
- Mists are liquid particulate matter (5 to 100 µm)
- Smoke is chemically generated particulates (solid and liquid) of organic origins (0.01 to 0.3 µm)

Selection of Respirator

The following factors shall be taken into account when selecting the proper respirator:

Concentration and Type of Contaminant

The concentration and type of contaminant will determine the model and type of respirator and cartridges/filters or filters to be used. The concentration is based on a sampling of the atmosphere.

Location of Hazardous Area

(Confined Space, nearby contaminants, etc)

Worker Activity

(Extreme heat, cold, welding hood requirement, etc.)

Types of Respirators

Air-purifying respirators can be either full-face or half masks with mechanical or chemical cartridges to filter dusts, mists, fumes, vapours or gases.

Powered air-purifying respirators use a blower to pass the contaminated air through a filter. The purified air is then delivered into a mask or hood. They filter dusts, mists, fumes, vapours and gases, just like ordinary air-purifying respirators.

Air-purifying respirators cannot be used in oxygen-deficient atmospheres, which can result when another gas displaces the oxygen or consumption of oxygen by a chemical reaction occurs. Oxygen levels below 19.5% require either a source of supplied air or supplied-air respirator protection. Levels below 16% are considered to be unsafe and could cause death. To determine the proper cartridge for air-purifying respirators contact the COMPANY Safety Manager or a qualified on-site safety representative of the client. You should also consult the Material Safety Data Sheet of the substance that needs to be filtered.

All cartridges are assigned a color designating the type of contaminant they will filter:

White:	Acid gas
Black:	Organic vapours
Green:	Ammonia gas
Yellow:	Acid gas and organic vapours
Purple:	Radioactive materials
Orange:	Dust, fumes and mists
Olive:	Other gases and vapours

Once the wearer of the respirator can detect an odour, irritation, or taste of the contaminant, the cartridge should be replaced. All cartridges and/or filters shall be changed at the beginning of each shift.

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Supplied-air respirators provide the highest level of protection against highly toxic and unknown materials. Supplied air refers to self-contained breathing apparatuses (SCBAs) and air-line respirators. SCBAs have a limited air supply that is carried by the user, allowing for good mobility and fewer restrictions than air-line respirators.

Air-line respirators have an air hose that is connected to a fresh air supply from a central source. The source can be from a compressed air cylinder or air compressor that provides at least Grade D breathing air.

Emergency Escape Breathing Apparatuses (EEBAs) provide oxygen for 5, 10 or 15 minutes depending on the unit. These are for emergency situations in which an employee must escape from environments immediately dangerous to life or health (IDLH).

SCBA (Self Contained Breathing Apparatus)

NC Sturgeon does NOT allow employees to work in an Immediately Dangerous to Life and Health (IDLH) environment.

In order to maintain the NIOSH/MSHA approval of any respirator, mixing parts from other respirator manufacturers is prohibited. This includes airline hoses, valves, gaskets, cartridges, etc. For example, do not use North cartridges or valve gaskets with an MSA product.

Brand and Models

NC Sturgeon has selected North Safety as its NIOSH-certified respirator. Only this brand of respirator shall be used in compliance with the conditions of the certification of its Respiratory Protection Program (fit testing model, no mixing of different manufacturer parts, cartridges, filters, etc.).

The specific model will be based on the hazard, concentration of contaminant, oxygen level, work environment and type of work being performed. To aid in the selection process the following will be used to identify the proper North respiratory equipment for the work being performed and hazard that is present.

- NIOSH Pocket Guide to Chemicals
- North Cartridge Selection Guide
- North Respirator Selection Guide

Estimate of Exposures and Contaminant Information

- No employee shall enter an IDLH environment.
- Normal oxygen levels shall be maintained.
- No employee shall be exposed to an atmosphere containing concentrations that would exceed the STEL or PEL for the identified atmospheric hazard.

Respirator Fit Testing

Before an employee may be required to use any respirator with a negative or positive pressure tight-fitting face piece, the employee must be fit tested with the same make, model, style, and size of respirator that will be used.

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This section specifies the kinds of fit tests allowed, the procedures for conducting them, and how the results of the fit tests must be used.

All respirator users are fit-tested at least annually and more often if other federal requirements apply.

Supplied Air Respirators are required to be fit tested as well.

NC Sturgeon shall ensure that employees using a tight-fitting face piece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT) as stated in this program.

NC Sturgeon shall ensure that an employee using a tight-fitting face piece respirator is fit tested prior to initial use of the respirator, whenever a different respirator face piece (size, style, model or make) is used, and at least annually thereafter.

NC Sturgeon shall conduct an additional fit test whenever the employee reports, or **NC Sturgeon's** PLHCP, supervisor, or Program Administrator makes visual observations of, changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

If after passing a QLFT or QNFT, the employee subsequently notifies **NC Sturgeon**, Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable, the employee shall be given a reasonable opportunity to select a different respirator face piece and to be retested.

The fit test shall be administered using an OSHA-accepted QLFT or QNFT protocol. The OSHA-accepted QLFT and QNFT protocols and procedures are contained in this section.

QLFT may only be used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less. Half face air filtering respirators may be fit tested with irritant smoke while full face air filtering respirators require Portacount fit testing.

If the fit factor, as determined through an OSHA-accepted QNFT protocol, is equal to or greater than 100 for tight-fitting half face pieces, or equal to or greater than 500 for tight-fitting full face pieces, the QNFT has been passed with that respirator.

Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators shall be accomplished by performing quantitative or qualitative fit testing in the negative pressure mode, regardless of the mode of operation (negative or positive pressure) that is used for respiratory protection.

Qualitative fit testing of these respirators shall be accomplished by temporarily converting the respirator user's actual face piece into a negative pressure respirator with appropriate filters, or by using an identical negative pressure air-purifying respirator face piece with the same sealing surfaces as a surrogate for the atmosphere-supplying or powered air-purifying respirator face piece.

Quantitative fit testing of these respirators shall be accomplished by modifying the face piece to allow sampling inside the face piece in the breathing zone of the user, midway between the nose and mouth. This requirement

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shall be accomplished by installing a permanent sampling probe onto a surrogate face piece, or by using a sampling adapter designed to temporarily provide a means of sampling air from inside the face piece.

Any modifications to the respirator face piece for fit testing shall be completely removed, and the face piece restored to NIOSH-approved configuration, before that face piece can be used in the workplace.

Fit Test Procedures

The requirements in this section apply to all OSHA-accepted fit test methods, both QLFT and QNFT.

The test subject shall be allowed to pick the most acceptable respirator from a sufficient number of respirator sizes so that the respirator is acceptable to, and correctly fits, the user.

Prior to the selection process, the test subject shall be shown how to put on a respirator, how it should be positioned on the face, how to set strap tension and how to determine an acceptable fit. A mirror shall be available to assist the subject in evaluating the fit and positioning of the respirator. This instruction may not constitute the subject's formal training on respirator use, because it is only a review.

The test subject shall be informed that he/she is being asked to select the respirator that provides the most acceptable fit. Each respirator represents a different size and shape, and if fitted and used properly, will provide adequate protection.

The test subject shall be instructed to hold each chosen face piece up to the face and eliminate those that obviously do not give an acceptable fit.

The more acceptable face pieces are noted in case the one selected proves unacceptable; the most comfortable mask is donned and worn at least five minutes to assess comfort. Assistance in assessing comfort can be given by discussing the following points:

- If the test subject is not familiar with using a particular respirator, the test subject shall be directed to don the mask several times and to adjust the straps each time to become adept at setting proper tension on the straps.
- Position of the mask on the nose
- Room for eye protection
- Room to talk
- Position of mask on face and cheeks

The following criteria shall be used to help determine the adequacy of the respirator fit:

- Chin properly placed;
- Adequate strap tension, not overly tightened;
- Fit across nose bridge;
- Respirator of proper size to span distance from nose to chin;
- Tendency of respirator to slip;
- Self-observation in mirror to evaluate fit and respirator position.

Use the Fit Test form.

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User Seal Check

Before conducting the negative and positive pressure checks, the subject shall be told to seat the mask on the face by moving the head from side-to-side and up and down slowly while taking in a few slow deep breaths. The test subject shall conduct a user seal check, either the negative or positive pressure seal checks described below:

Positive Pressure Check

Close off the exhalation valve and exhale gently into the face piece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the face piece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve and then carefully replacing it after the test.

Negative Pressure Check

Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the face piece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the face piece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

The test shall not be conducted if there is any hair growth between the skin and the face piece sealing surface, such as stubble beard growth, beard, moustache or sideburns which cross the respirator sealing surface. Any type of apparel which interferes with a satisfactory fit shall be altered or removed, including glasses.

If a test subject exhibits difficulty in breathing during the tests, she or he shall be referred to a physician or other licensed health care professional, as appropriate, to determine whether the test subject can wear a respirator while performing her or his duties. If the employee finds the fit of the respirator unacceptable, the test subject shall be given the opportunity to select a different respirator and to be retested.

Prior to the commencement of the fit test, the test subject shall be given a description of the fit test and the test subject's responsibilities during the test procedure. The description of the process shall include a description of the test exercises that the subject will be performing. The respirator to be tested shall be worn for at least 5 minutes before the start of the fit test.

The fit test shall be performed while the test subject is wearing any applicable safety equipment that may be worn during actual respirator use which could interfere with respirator fit.

Test Exercises

Each test exercise shall be performed for one minute except for the grimace exercise which shall be performed for 15 seconds. The test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried. If due to medical or health conditions the employee cannot perform the test exercises the fit test shall not be performed and the employee not allowed to use a respirator until all elements of the fit test can be achieved.

The respirator shall not be adjusted once the fit test exercises begin. Any adjustment voids the test, and the fit test must be repeated.

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The following test exercises are to be performed for all fit testing methods prescribed in this procedure:

- Normal breathing. In a normal standing position, without talking, the subject shall breathe normally.
- Deep breathing. In a normal standing position, the subject shall breathe slowly and deeply, taking caution so as not to hyperventilate.
- Turning head side to side. Standing in place, the subject shall slowly turn his/her head from side to side between the extreme positions on each side. The head shall be held at each extreme momentarily so the subject can inhale at each side.
- Moving head up and down. Standing in place, the subject shall slowly move his/her head up and down. The subject shall be instructed to inhale in the up position (i.e., when looking toward the ceiling).
- Talking. The subject shall talk out loud slowly and loud enough so as to be heard clearly by the test conductor. The subject shall read from the Rainbow Passage

Rainbow Passage

“When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond reach, his friends say he is looking for the pot of gold at the end of the rainbow.” Continue to read for one minute.

- Grimace. The test subject shall grimace by smiling or frowning. (This applies only to QNFT testing; it is not performed for QLFT)
- Jogging in place. The test subject shall jog in place being careful to be aware of their surroundings.
- Normal breathing. Same as exercise (1).

Qualitative Fit Test (QLFT) Protocols

General

NC Sturgeon shall ensure that persons administering QLFT are able to prepare test solutions, calibrate equipment and perform tests properly, recognize invalid tests, and ensure that test equipment is in proper working order. **NC Sturgeon** shall ensure that QLFT equipment is kept clean and well maintained so as to operate within the parameters for which it was designed.

Irritant Smoke (Stannic Chloride) Protocol

This qualitative fit test uses a person's response to the irritating chemicals released in the “smoke” produced by a stannic chloride ventilation smoke tube to detect leakage into the respirator.

General Requirements and Precautions. The respirator to be tested shall be equipped with high efficiency particulate air (HEPA) or P100 series filter(s).

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Only stannic chloride smoke tubes shall be used for this protocol. No form of test enclosure or hood for the test subject shall be used.

The smoke can be irritating to the eyes, lungs, and nasal passages. The test conductor shall take precautions to minimize the test subject's exposure to irritant smoke. Sensitivity varies, and certain individuals may respond to a greater degree to irritant smoke. Care shall be taken when performing the sensitivity screening checks that determine whether the test subject can detect irritant smoke to use only the minimum amount of smoke necessary to elicit a response from the test subject.

The fit test shall be performed in an area with adequate ventilation to prevent exposure of the person conducting the fit test or the build-up of irritant smoke in the general atmosphere.

The person to be tested must demonstrate his or her ability to detect a weak concentration of the irritant smoke.

- The test operator shall break both ends of a ventilation smoke tube containing stannic chloride, and attach one end of the smoke tube to a low flow air pump set to deliver 200 millilitres per minute, or an aspirator squeeze bulb. The test operator shall cover the other end of the smoke tube with a short piece of tubing to prevent potential injury from the jagged end of the smoke tube.
- The test operator shall advise the test subject that the smoke can be irritating to the eyes, lungs, and nasal passages and instruct the subject to keep his/her eyes closed while the test is performed.
- The test subject shall be allowed to smell a weak concentration of the irritant smoke before the respirator is donned to become familiar with its irritating properties and to determine if he/she can detect the irritating properties of the smoke. The test operator shall carefully direct a small amount of the irritant smoke in the test subject's direction to determine that he/she can detect it.

Irritant Smoke Fit Test Procedure

- The person being fit tested shall don the respirator without assistance, and perform the required user seal check(s).
- The test subject shall be instructed to keep his/her eyes closed if wearing a half face respirator.
- The test operator shall direct the stream of irritant smoke from the smoke tube toward the face seal area of the test subject, using the low flow pump or the squeeze bulb. The test operator shall begin at least 12 inches from the face piece and move the smoke stream around the whole perimeter of the mask. The operator shall gradually make two more passes around the perimeter of the mask, moving to within six inches of the respirator.
- If the person being tested has not had an involuntary response and/or detected the irritant smoke, proceed with the test exercises.
- The exercises identified in the Test Exercises of this procedure shall be performed by the test subject while the respirator seal is being continually challenged by the smoke, directed around the perimeter of the respirator at a distance of six inches.
- If the person being fit tested reports detecting the irritant smoke at any time, the test is failed. The person being retested must repeat the entire sensitivity check and fit test procedure.
- Each test subject passing the irritant smoke test without evidence of a response (involuntary cough, irritation) shall be given a second sensitivity screening check, with the smoke from the same smoke tube used during the

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fit test, once the respirator has been removed, to determine whether he/she still reacts to the smoke. Failure to evoke a response shall void the fit test.

- If a response is produced during this second sensitivity check, then the fit test is passed. The glass tube shall be disposed of properly.

Quantitative Fit Test (QNFT) Protocols

Using controlled negative pressure and appropriate instrumentation to measure the volumetric leak rate of a face piece to quantify the respirator have been demonstrated to be acceptable to OSHA.

NC Sturgeon shall ensure that persons administering QNFT are able to calibrate equipment and perform tests properly, recognize invalid tests, calculate fit factors properly and ensure that test equipment is in proper working order.

NC Sturgeon shall ensure that QNFT equipment is kept clean, and is maintained and calibrated according to the manufacturer's instructions so as to operate at the parameters for which it was designed.

Portacount Fit Test Requirements

- Check the respirator to make sure the respirator is fitted with a high-efficiency filter and that the sampling probe and line are properly attached to the face piece.
- Instruct the person to be tested to don the respirator for five minutes before the fit test starts. This purges the ambient particles trapped inside the respirator and permits the wearer to make certain the respirator is comfortable. This individual shall already have been trained on how to wear the respirator properly.
- Check the following conditions for the adequacy of the respirator fit: Chin properly placed; Adequate strap tension, not overly tightened; Fit across nose bridge; Respirator of proper size to span distance from nose to chin; Tendency of the respirator to slip; Self-observation in a mirror to evaluate fit and respirator position.
- Have the person wearing the respirator do a user seal check. If leakage is detected, determine the cause. If leakage is from a poorly fitting face piece, try another size of the same model respirator, or another model of respirator.
- Follow the manufacturer's instructions for operating the Portacount and proceed with the test.
- The test subject shall be instructed to perform the exercises in Test Exercises section of this procedure.
- After the test exercises, the test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried.

Portacount Test Instrument

The Portacount will automatically stop and calculate the overall fit factor for the entire set of exercises. The overall fit factor is what counts. The Pass or Fail message will indicate whether or not the test was successful. If the test was a Pass, the fit test is over. Since the pass or fail criterion of the Portacount is user programmable, the test operator shall ensure that the pass or fail criterion meet the requirements for minimum respirator performance.

A record of the test needs to be sent to the Safety Manager and kept on file, assuming the fit test was successful. The record must contain the test subject's name; overall fit factor; make, model, style, and size of respirator used; and date tested.

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Use, Maintenance and Care of Respirators

This section requires **NC Sturgeon** to provide for the use, cleaning and disinfecting, storage, inspection, and repair of respirators used by employees. Appendix B - Respirator Cleaning Procedures (Mandatory) shall be followed.

Use

- Items that can affect the face to mask seal are prohibited. This includes facial hair, glasses, clothing, etc.
- Each time a respirator is put on a positive and negative pressure check shall be performed.

Cleaning and Disinfecting Requirements

NC Sturgeon shall provide each respirator user with a respirator that is clean, sanitary, and in good working order. **NC Sturgeon** shall ensure that respirators are cleaned and disinfected using the procedures in this Respiratory Protection Program, or procedures recommended by the respirator manufacturer, provided that such procedures are of equivalent effectiveness. The respirators shall be cleaned and disinfected at the following intervals:

- Respirators issued for the exclusive use of an employee shall be cleaned and disinfected by the employee as often as necessary to be maintained in a sanitary condition,
- Respirators used in fit testing and training shall be cleaned and disinfected after each use by the Safety Manager or designated person.
- Each individual who is assigned a cartridge respirator is responsible for seeing that the respirator is cleaned, inspected and properly stored.

Cleaning Procedures

- Remove filters, cartridges, or canisters. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.
- Wash components in warm water with a mild detergent or with a cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.
- Rinse components thoroughly in clean, warm, preferably running water. Drain.
- When the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in commercially available cleansers of equivalent disinfectant quality. Another alternative is to use wipes containing alcohol that are intended for use with respirators.
- Rinse components thoroughly in clean, warm, preferably running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on face pieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.
- Components should be hand-dried with a clean lint-free cloth or air dried. Reassemble face piece, replacing filters, cartridges, and canisters where necessary. Test the respirator to ensure that all components work properly.

Storage and Inspection

- Respiratory equipment shall be stored in a manner to protect it from damage, contamination, temperature extreme, etc.

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- Respiratory equipment intended for emergency use shall be stored in an area that is readily accessible and be clearly marked.

NC Sturgeon shall ensure that respirators are inspected as follows:

- All respirators used in routine situations shall be inspected by the employee before each use and during cleaning;
- A check by the employee of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the face piece, head straps, valves, connecting tube, and cartridges, canisters or filters; and
- A check of elastomeric parts for pliability and signs of deterioration.
- Emergency respiratory equipment will be inspected at least monthly, and before and after each use.
- Escape only respiratory equipment will be inspected before being carried into workplace.

Breathing Air Quality and Use

NC Sturgeon shall ensure that compressed air accords with the following specifications:

- Compressed breathing air shall meet at least the requirements for Type 1-Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:
 - Oxygen content (v/v) of 19.5-23.5%;
 - Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;
 - Carbon monoxide (CO) content of 10 ppm or less;
 - Carbon dioxide content of 1,000 ppm or less; and
 - Lack of noticeable odour.
- **NC Sturgeon** shall ensure that oxygen is not used in compressed air units.
- **NC Sturgeon** shall ensure that oxygen concentrations greater than 23.5% are used only in equipment designed for oxygen service or distribution.
- **NC Sturgeon** shall ensure that cylinders used to supply breathing air to respirators meet DOT requirements and that:
 - Cylinders are tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 and part 178);
 - Cylinders of purchased breathing air have a certificate of analysis from the supplier that the breathing air meets the requirements for Type 1--Grade D breathing air; and
 - The moisture content in the cylinder does not exceed a dew point of -50 deg. F (-45.6 deg. C) at 1 atmosphere pressure.
- **NC Sturgeon** shall ensure that compressors used to supply breathing air to respirators are constructed and situated so as to:
 - Prevent entry of contaminated air into the air-supply system;

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- Minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (5.56 deg. C) below the ambient temperature;
 - Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions.
- Have a tag containing the most recent change date and the signature of the person authorized by **NC Sturgeon** to perform the change. The tag shall be maintained at the compressor.
 - For compressors that are not oil-lubricated, **NC Sturgeon** shall ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.
 - For oil-lubricated compressors, **NC Sturgeon** shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.
 - **NC Sturgeon** shall ensure that breathing air couplings are incompatible with outlets for nonrespirable worksite air or other gas systems. No asphyxiating substance shall be introduced into breathing air lines.

Repairs

NC Sturgeon shall ensure that respirators that fail an inspection or are otherwise found to be defective are immediately removed from service, and are discarded or repaired or adjusted in accordance with the following procedures:

- Repairs or adjustments to respirators are to be made only by persons appropriately trained to perform such operations and shall use only the respirator manufacturer's NIOSH-approved parts designed for the respirator;
- Repairs shall be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed; and

Voluntary Use

If an employee chooses to voluntarily wear a respirator when not required by this Program (contaminants do not meet protection standards, odours, etc.) they will be advised of the following in their training:

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for employees.

However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the employee. Sometimes, employees may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

- Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.

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

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Workplace Monitoring

A program of monitoring potential employee exposures has been implemented through the corporate health and safety department. Project personnel may also be assigned with the task of conducting air monitoring. Direct-reading instruments will also be used in the characterization of potential exposures. All the data collected is used to determine the appropriateness of the respiratory equipment.

Recordkeeping

NC Sturgeon will establish and retain written information regarding medical evaluations, fit testing and the respirator program. Records of medical evaluations required by this section must be retained and made available in accordance with 29 CFR 1910.1020. **NC Sturgeon** shall provide the employee with an opportunity to discuss the questionnaire and examination results with the PLHCP.

Records will be treated confidentially and maintained on file in the **NC Sturgeon** corporate office by the Safety Manager.

Program Evaluation

NC Sturgeon shall conduct evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.

NC Sturgeon shall regularly consult employees required to use respirators to assess the employees' views on this program's effectiveness and to identify any problems. Any problems that are identified during this assessment shall be corrected. Factors to be assessed and verified include, but are not limited to:

- Respirator fit (including the ability to use the respirator without interfering with effective workplace performance); Appropriate respirator selection for the hazards to which the employee is exposed;
- Proper respirator use under the workplace conditions the employee encounters; and
- Proper respirator maintenance.

Training

All employees will receive respirator training during their initial health and safety training class and on at least an annual basis, if required for their job classification. Training shall address employee knowledge of respirators, fit, use, limitations, emergency situations, wearing, fit checks, maintenance & storage, medical signs and symptoms of effective use and general requirements of the OSHA standard. The training must be provided before requiring the employee to use the respirator.

Retraining

Retraining shall be administered annually, and when the following situations occur:

- Changes in the workplace or the type of respirator render previous training obsolete;
- Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill; or

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- Any other situation arises in which retraining appears necessary to ensure safe respirator use.

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COMPANY Qualitative Respiratory Fit Test Record Sheet

Note: Employee Must Have Completed Respiratory Protection Training and Passed Airway Exam Prior To Fit Testing

Test Date: _____

Employee Name: _____ SS# _____

Test Agent: Irritant Smoke (Stannic Chloride)

Respirator Identification:

Model: North 7700 Series Half Mask Size (circle one): Small Medium Large
 Manufacturer: North Safety Products Approval No: 42 CFR 84
 Additional Information: Respirator must be equipped with North HEPA filters

Fit Test Protocol (Test Subject Initials indicate steps were performed):

___ TOLD TO KEEP EYES CLOSED DURING SMOKE EXPOSURE

___ Test subject smelled irritant smoke before fit test	___ Wore respirator 5 minutes before fit test
___ Protocol reviewed before fit test	___ Test subject did not have hair in fitting area
___ Shown how to wear respirator	___ Performed positive pressure & negative fit
___ Mirror available for use by subject	check successfully after seating respirator
___ Must wear PPE (hard hat, etc.) if needed	

Fit Test Steps (1 minute each except Grimace = 15 seconds)

___ Breath normally	___ Breathe deeply	___ Turned head side to side
___ Nod up and down	___ Talking (Read Rainbow Passage)	___ Grimace
___ Jog in place	___ Breath normally	

"When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond his reach, his friends say he is looking for the pot of gold at the end of the rainbow".

Fit Test Results: ___ Pass ___ Fail

Test Subject Signature: _____ Date: _____

Examiner's Name: _____ Examiner's Signature: _____ Date: _____

Distribution: Employee Local File - COMPANY Safety & Training Dept

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Purpose

The purpose of this training program is to ensure a safe and incident free lifting operation in the onshore and offshore environment.

Scope

All **NC Sturgeon** employees that work onshore or in the Outer Continental Shelf (OCS) are to receive training in "rigging". When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Rigging - the art or process of safely attaching a load to a hook by means of adequately rated and properly applied slings and related hardware.

Qualified Rigger - any person who attaches or detaches lifting equipment that has successfully completed training meeting the requirements set forth by American Petroleum Institute's Recommended Practice 2D 5th Edition (API RP-2D 5th Edition).

Outer Continental Shelf - means all submerged lands lying seaward and outside of the area of lands beneath navigable waters beginning three (3) miles from the coastline extending outwards and of which the subsoil and seabed appertain to the United States and are subject to its jurisdiction and control.

Key Responsibilities

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her region is required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Supervisors shall assist the managers in the tasks described above. The supervisor shall verify that each of their employees have the proper training before those employees report to duty onshore or on an OCS facility.

Employees shall assist their supervisors in tracking required training and follow safe rigging practices. The employee shall monitor all expiration dates pertaining to his/her required training and notify his/her supervisor in advance of any nearing expiration dates.

Only qualified rigger trained personnel can attach or detach lifting equipment to loads or lifting loads. **NC Sturgeon** personnel DO NOT neither inspect nor operate offshore cranes.

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Procedure

General

Only “qualified riggers” are allowed to attach any loads to a lifting hook and only “qualified operators” are allowed to operate a crane while engaged in lifting operations onshore or on the Outer Continental Shelf.

API RP-2D has established a three-tiered classification. Employees will be certified in the applicable classifications as required before starting job assignments requiring rigging and lift operations offshore:

- Qualified rigger.
- Qualified inspector.
- Qualified operator. (**NC Sturgeon** personnel DO NOT operate offshore cranes.)

Material Handling

- Rigging equipment shall be inspected to ensure it is safe. Rigging equipment for material handling shall be inspected prior to use and on each shift and as necessary during its use to ensure that equipment is safe.
- Defective rigging equipment shall not be used and removed from service.
- Rigging equipment shall not be loaded beyond its recommended safe working load and load identification shall be attached to the rigging.
- Rigging equipment not in use shall be removed from the immediate work area so as not to present a hazard to employees.
- 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 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.
- All employees shall be kept clear of loads about to be lifted and of suspended loads. No employee shall be allowed under a suspended load.

Training and Education

A “Qualified Offshore Rigger” shall successfully complete an approved “Rigger” course. To successfully complete an approved “API2D Rigger” course, the **NC Sturgeon** employee must verify that they have gained knowledge through participating in classroom lectures, participating with hands-on training and then successfully passing a written exam. Once the employee successfully completes the course, a “Rigger” card will be issued to that individual. During the classroom lectures, hands-on training and written exam the **NC Sturgeon** employee shall display their competency in the following topics:

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- The selection of proper hardware (eye bolts, shackles, hooks, wire rope products, synthetic slings, chain slings, etc) for the correct application (weight, hitches, angles, temperatures, center of gravity, etc.).
- The inspection of the selected hardware before, during and after the lift.
- The proper methods of securing the load, attaching the load to the hook, lifting the load, handling of the load during the movement of the load, and lowering and placement of load.
- The proper storage of the rigging equipment. All **NC Sturgeon** employees shall re-certify their “qualified rigger” training on a four (4) year basis.

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Purpose

The purpose of this program is to prevent injuries due to falls from elevated work areas and ensure employees and contractors are able to inspect scaffolding materials and erected scaffolds.

Scope

This program is applicable at every work area where scaffolding is erected. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Definitions

Bearer - A horizontal member of a scaffold upon which the platform rests and which may be supported by ledgers.

Brace - A tie that holds one scaffold member in a fixed position with respect to another member.

Coupler - A device for locking together the components of a tubular metal scaffold which shall be designed and used to safely support the maximum intended loads.

Double pole or independent pole scaffold - A scaffold supported from the base by a double row of uprights, independent of support from the walls and constructed of uprights, ledgers, horizontal platform bearers, and diagonal bracing.

Guardrail - A rail secured to uprights and erected along the exposed sides and ends of platforms.

Heavy Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 75 pounds per square foot.

Ledger (stringer) - A horizontal scaffold member which extends from post to post and which supports the putlogs or bearer forming a tie between the posts.

Light Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 25 pounds per square foot.

Manually Propelled Mobile Scaffold - Manually propelled mobile scaffold.

Maximum intended load - The total of all loads including the working load, the weight of the scaffold, and such other loads as may be reasonably anticipated.

Medium duty scaffold - A scaffold designed and constructed to carry a working load not to exceed 50 pounds per square foot.

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Mid-Rail - A rail approximately midway between the guardrail and platform, used when required, and secured to the uprights erected along the exposed sides and ends of platforms.

Putlog - A scaffold member upon which the platform rests.

Runner - The lengthwise horizontal bracing or bearing members or both.

Scaffold - Any temporary elevated platform and its supporting structure used for supporting workmen or materials or both.

Toe board - A barrier secured along the sides and ends of a platform, to guard against the falling of material.

Tube and coupler scaffold - An assembly consisting of tubing, which serves as posts, bearers, braces, ties, and runners, a base supporting the posts, and special couplers which serve to connect the uprights and to join the various members.

Tubular welded frame scaffold - A sectional, panel, or frame metal scaffold substantially built up of prefabricated welded sections that consist of posts and horizontal bearer with intermediate members. Panels or frames shall be braced with diagonal or cross braces.

Working Load - Load imposed by men, materials, and equipment.

Key Responsibilities

Managers and Supervisors

- Responsible for ensuring that scaffolds are erected by a qualified person, that set up inspections are performed, and all daily inspections are performed before work starts for the day.
- Responsible for ensuring that all employees, and/or contractors have been trained in the use and inspection methods for scaffolds.
- Responsible for ensuring that all employees and contractors are aware that if an inspection discovers a defect, the scaffold cannot be used until repairs are made.

Employees

- Responsible for following this program by inspecting the scaffolds daily and report any damages or repairs that may be needed to their supervisor.

Procedure

General Requirements

Scaffolds shall be furnished and erected in accordance with applicable standards for persons engaged in work that cannot be done safely from the ground or from solid construction. Except that ladders used for such work shall conform to ladder safety standards.

Scaffolds shall only be erected by a qualified third party, who is competent to certify the scaffolding safe to use.

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The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose boards shall not be used to support scaffolds or planks.

Scaffolds and their components shall be capable of supporting without failure at least four times the maximum intended loads. Scaffold components must meet OSHA requirements 29 CFR 1910.28 and 29 CFR 1926.451.

Wood scaffold planks must be cross-supported every 8 feet. Scaffold deck boards shall be cleated, wired or nailed into place.

All working levels of scaffolds will be floored completely except where internal ladders require space for ladder openings.

Scaffolds and other devices mentioned or described in this program shall be maintained in safe condition. Scaffolds shall not be altered or moved horizontally while they are occupied.

Any scaffold damaged or weakened from any cause shall be immediately repaired and shall not be used until repairs have been completed.

Scaffolds shall not be loaded in excess of the working loads for which they are intended.

Bolts used in the construction of scaffolds shall be of adequate size and in sufficient numbers at each connection to develop the designed strength of the scaffold.

All platforms shall be overlapped (minimum 12 inches) and secured from any movement.

An access ladder or equivalent safe access shall be provided.

Scaffold planks shall extend over their end supports not less than 6 inches or more than 18 inches.

The poles, legs, or uprights of scaffolds shall be plumb, and securely and rigidly braced to prevent swaying and displacement.

Materials being hoisted onto a scaffold shall have a tag line.

Overhead protection shall be provided for workers on a scaffold exposed to overhead hazards.

Toe boards and guardrails shall be installed if a scaffold or platform is erected to a height of 6 feet or more. Scaffolds shall be provided with a screen between the toe board and the guardrail, extending along the entire opening, consisting of No. 18 gauge wire one-half inch mesh or the equivalent, where workers are required to work or pass under the scaffolds.

Work shall not be performed on a scaffold during storms or high winds.

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Work shall not be performed on scaffolds that are covered with snow or ice, unless all snow and ice has been removed and all planking has been sanded to prevent slipping.

Tools, material, and debris shall not be allowed to accumulate in quantities to cause a hazard.

Inspections

Scaffolding shall be inspected, by a qualified person, in conjunction with the manufactures required recommendations. The competent person must also insure scaffolds are safe prior to and during scaffold use.

- At a minimum, the following shall be inspected by the competent person after erection, before the start of the day or beginning of a shift change to ensure scaffolds are safe prior to and during use:
 - Ground or surface footing shall be inspected to ensure that there is no settling.
 - All main supports and cross braces shall be inspected for any signs of damage, missing pins, bolts and any locks and/or safety keepers.
 - All walking surfaces and/or planks shall be inspected for damage and proper placements and any possible movement.
 - All walkways and planks must be secure to prevent any movement.
- Inspection shall be made to ensure that the scaffold is stable and any movement is prevented.
- If during the inspection, a defect or damage to the scaffold is discovered, the scaffold shall be tagged out by the competent person, complied with and use prohibited until needed repairs are made.

Mandatory Signs and Tags

Signs and tags shall be visible at all times when work is being performed, and shall be removed or covered promptly when the hazards no longer exist.

Defective or unsafe equipment or conditions shall be tagged out by the competent person using a weather resistant tag secured to the scaffolding structure on all four sides and must be complied with. An example would be improper footing conditions were observed.

Danger signs shall be used only where an immediate hazard exists. Danger signs must be posted around the immediate area of the scaffold, to alert other workers of possible danger from falling objects from the scaffold.

Caution Signs and/or barricade tape shall be used to mark off a larger area around scaffolding warning other workers to use caution.

Modifications

Modification and repairs shall be performed by a qualified person, who is competent to certify the scaffolding safe to use to ensure non-qualified personnel do not create additional hazards.

Employees shall not perform any modifications or repairs, unless they have been trained and certified, and failure to comply may result in disciplinary action and or termination.

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Training Requirements

NC Sturgeon is required to train all employees that work on scaffolds regarding hazards by "qualified" persons. The supervisor shall have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training shall occur before use and include the following areas:

- Basic safety information.
- Hazards including fall protection, electrical safety, falling object protection.
- Tags – types and the requirement to comply with.
- The proper use of the scaffold, and the proper handling of materials on the scaffold.
- The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used.
- The maximum intended load capacity of the scaffolds used.

The supervisor shall have each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold trained by a competent person to recognize any hazards associated with the work in question.

- The training shall include the following topics, as applicable:
- The nature of scaffold hazards.
- The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in use.
- The design criteria, maximum intended load-carrying capacity and intended use of the scaffold.

When the employer has reason to believe that an employee lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, the employer shall retrain each employee so that the requisite proficiency is regained. Retraining is also required in at least the following situations:

- Where changes in scaffolding at the worksite present a hazard about which an employee has not been previously trained.
- 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.
- Where inadequacies in an affected employee's work involving scaffolds indicate that the employee has not retained the requisite proficiency.

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Tube And Coupler Scaffolds - Light Duty

Uniformly distributed load	Not to exceed 25 p.s.f.	
Post Spacing (longitudinal)	10 ft. 0 in.	
Post Spacing (transverse)	6 ft. 0 in.	
Working Levels	Additional Planked Levels	Maximum Height
1	8	125 ft.
2	4	125 ft.
3	0	91 ft. 0 in.

Tube And Coupler Scaffolds - Medium Duty

Uniformly distributed load	Not to exceed 50 p.s.f	
Post spacing (longitudinal)	8 ft. 0 in.	
Post spacing (transverse)	6 ft. 0 in.	
Working Levels	Additional Planked Levels	Maximum Height
1	6	125 ft.
2	0	78 ft. 0 in.

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Purpose

The purpose of this plan is to document spill prevention and response requirements. Each **NC Sturgeon** work site will develop a spill prevention and response plan based on the requirements and template provided.

Scope

This procedure applies to all **NC Sturgeon** operations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers **NC Sturgeon** employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Requirements

Each work site spill prevention and response plan shall contain the following requirements.

- Chemical substances should be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals should be kept in closed containers and stored so they are not exposed to stormwater.
- The program must identify chemicals used that may be potentially spilled or released. This will include both liquid chemicals used at our facilities or brought on to owner client sites.
- Spill kits must be adequate for any anticipated spills. A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials. The contents of spill response kits shall be periodically assessed to ensure the availability of adequate spill response supplies and adjust inventory as necessary.
- **NC Sturgeon** shall ensure the availability of adequate spill response supplies by periodic inspection to assess their availability and adjust the inventory as necessary.
- Employees must be instructed on spill prevention and the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal and communication procedures.
- Areas where chemicals may be used or stored must be maintained using good housekeeping best management practices. This includes, but is not limited to clean and organized storage, labeling and secondary containment where necessary.
- Proper communication measures for employees to initiate in the event of a spill will be created on a site by site basis. Communication procedures will be based on type and quantity of materials spilled.
- Environmental spills shall be reported to environmental authorities when required. Reporting procedures will be based on type and quantity of materials spilled.

The following template shall be used for each work site.

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Copies of this plan are located at the facility and are available to all employees.

Location(s) of plan(s): _____

Facility Information

Facility Name: _____

Mailing Address: _____

Physical address if different: _____

Owner Name: _____

Owner Address: _____

Primary Contact Name: _____
 Work Phone Number: _____
 Home Phone Number: _____
 Mobile Phone Number: _____

Secondary Contact Name: _____
 Work Phone Number: _____
 Home Phone Number: _____
 Mobile Phone Number: _____

Date of Initial Operation: _____

Site Assessment

Location - Describe where facility is located.

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Facility Description

Facilities and Equipment (*examples are shown but complete per site description*):

☐ Garage for vehicle processing	Please list: _____ _____ _____ _____ _____
☐ Parts storage	
☐ Manufacturing Building	
☐ Spill kit/emergency equipment	
☐ Refrigerant (Freon) extractor	
☐ Parts washer	

Services:

☐ Dismantler/Recycler	Please list: _____ _____ _____ _____ _____
☐ Equipment Repair	
☐ Moving Equipment	
☐ Painting/Sandblasting	
☐ Manufacturing	

Fixed Storage - List capacity and contents of each storage container. For example, "One 6,000 gallon above ground tank containing diesel fuel." Be sure to include diesel, gasoline, waste oil, heating oil, kerosene, paint thinner and other solvents. Also describe the construction of the containers, secondary containment for each, liquid level indicators, alarms and method of corrosion protection for each container. _____

Non-Fixed Storage - List capacity and contents of each storage container. For example, "One 55 gallon drum for recycled oil." Be sure to indicate what each container is used for, its condition and construction and how secondary containment is provided. _____

Total quantity of stored materials: - The combined quantity of the materials listed above: _____ gallons

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Oil spill history

Place an X on the appropriate line and proceed accordingly.

- ___ There has never been a significant spill at the above named facility.
- ___ There have been one or more significant spills at the above named facility. Details of such spill(s) are described below. For each spill that occurred, supply the following information:
- Type and amount of oil spilled
 - Location, date and time of spill(s)
 - Watercourse affected
 - Description of physical damage
 - Cost of damage
 - Cost of clean-up
 - Cause of spill
 - Action taken to prevent recurrence

Potential Spill Volumes and Rates

Fill in all applicable blanks.

<u>Potential Event</u>	<u>Volume Released</u>	<u>Spill Rate</u>
Complete failure of a full tank*	___ gallons	instantaneous
Partial failure of a full tank*	1 to ___ gallons	gradual to instantaneous
Tank overflow**	1 to ___ gallons	up to ___ gallons per minute
Leaking during unloading***	up to ___ gallons	up to ___ gallons per minute
Pipe failure****	up to ___ gallons	up to ___ gallons per minute
Leaking pipe or valve****	several ounces to gallons	up to ___ gallons per minute
Fueling operations****	several ounces to gallons	up to ___ gallons per minute
Oil and grease	several ounces to quarts	spotting

* Volume of largest tank

** Calculate using the rate at which fuel is dispensed from the delivery truck into your tank(s).

*** Calculate using the rate at which petroleum would be withdrawn from the tank if it should have to be emptied (e.g., if it was being taken out of service).

**** Calculate based on the specifications of your equipment.

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Security - Provide a description of how all containers are protected when the facility is not in operation or unattended. Include a description of fencing, access control, gates, locks, etc. that prevent access by unauthorized individuals.

Facility Inspections

Routine Inspections - Name facilities and the frequency with which they are inspected. For example, "The fuel pumps are inspected daily. The materials storage area is inspected monthly." Describe all facility containers, piping, etc. that is to be inspected. Name the person who has responsibility to implement preventative maintenance programs, oversee on-site inspections, coordinate employee training, maintain records, update the plan as necessary, and ensure that reports are submitted to the proper authorities.

Annual Inspections - Include a description of annual comprehensive inspections. For example, "A site inspection is also conducted annually by appropriate responsible personnel to verify that the description of potential pollutant sources are accurate, that the map reflects current site conditions, and that the controls to reduce the pollutants identified in this plan are being implemented and are adequate. This annual inspection will be conducted above and beyond the routine inspections done focusing on designated equipment and areas where potential sources are located."

Record Keeping

Describe record keeping procedures. For example, "Record keeping procedures consist of maintaining all records a minimum of three years. The following items will be kept on file: current plan, internal site reviews, training records, and documentation of any spills or maintenance conducted in regards to these sites." *Maintenance Inspection, Employee Training, and Record Keeping* logs are included in this template for your use.

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Maintenance Inspections

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Employee Training

Employee Training Coordinator Name: _____

Use this table to record spill prevention and response training.

[illegible]

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Record Keeping of Incidental Spills

Record Keeper Name:

Record Keeper responsibilities include maintaining records of incidents, updating the plan as necessary and ensuring reports are submitted to the proper authorities when necessary.

Incident No.	Type of Incident	Date of Occurrence	How it was Cleaned Up

Appendices

Site map - Attach a site map as Appendix A to this plan. You may attach an existing site map or create your own. If you use an existing map, be sure that the items listed below are included. If you need to create a site map, use a large enough piece of paper so all site plan elements may be seen and try to keep the map to a scale (e.g. 1" = 20'). The following instructions should guide you step-by-step. Please use a straight edge (ruler) while creating the sketch.

- The sketch should be oriented as if you were in a plane looking down on your property (an aerial view), with North at the top (draw an arrow indicating north).
- Draw and label all roadways surrounding the work site.
- Draw and label all facilities within the work site as close proportionately as possible.
- Draw an arrow(s) pointing in the direction of downhill flow of water when it rains.
- Draw the location and general layout of all vehicles associated with the work site.
- Label any rivers or waterways surrounding the work site.
- Draw and label all methods of entry to the work site.
- Draw and label the location of all fuel containment facilities.
- Draw and label the location of all in-place spill prevention, control and countermeasure devices.

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Other attachments - List any additional information to be attached as Appendix B, C, D, etc. Label and staple the attachments to the end of this plan.

Appendix A: Site Map

Appendix B: Emergency Response Posting Locations

Appendix C: _____

Appendix D: _____

Management Approval

I certify that I have personally examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals responsible for obtaining this information, the information submitted is true, accurate and complete.

Signature

Title

Printed name

Date

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Purpose

The purpose of this program is to ensure that **NC Sturgeon** continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection and development of our subcontractors.

Scope

This program applies to all subcontractors and all **NC Sturgeon** locations.

General Requirements

All **NC Sturgeon** subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by **NC Sturgeon**. Approval requirements include:

- A formal safety review of the subcontractor being performed by **NC Sturgeon** safety department.
- The scope of the review was commensurate with the hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations and requirements of **NC Sturgeon**.
- The subcontractor agrees to abide by our Drug and Alcohol policy and onsite safety rules throughout the duration of the work.

Any subcontractor that has a “Non-Approved” safety status will not be used on any **NC Sturgeon** site.

Procedure

Pre-Qualification of Subcontractors

Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics.

Evaluation Safety Metrics

Acceptable safety metrics will be used as criteria for prequalifying and selecting subcontractors. The safety metrics and scoring will consider:

- **NC Sturgeon** Subcontractor Safety Pre-Qualification Form responses and subcontractor safety program documents review 60% (Rated from 0-60 total points)
- Subcontractor safety training documents review 20% (Rated from 0-20 total points)
- Subcontractor safety statistics review 20% (Rated from 0-20 total points)

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Evaluation Rating and Acceptance

The subcontractor rating system will have five designations:

- Equal to or Greater than 90 points = A – no restrictions.
- Between 85 and 89 points = B – Mitigation plan must be documented and approved by **NC Sturgeon** Safety.
- Between 81 and 84 points = C – Mitigation plan must be documented and approved by **NC Sturgeon** Safety; management approval in writing.
- Between 71 and 80 points = D – Mandatory commitment meeting with senior subcontractor management present; mitigation plan documented and approved by **NC Sturgeon** Safety; management approval in writing; trained subcontractor safety personnel on site during work regardless of number of workers.
- Less than 70 points = F – not to be used.

Once each subcontractor has been evaluated and scored, **NC Sturgeon** safety will provide management the scores/ranking.

NC Sturgeon reserves the right to change a subcontractor's status to "Non-Approved" if the subcontractor shows insufficient progress towards accepted mitigation plan or other agreed upon criteria.

Subcontractor Involvement

Contractors are required to follow or implement the work practices and systems described below while performing work at **NC Sturgeon** worksites:

- Attend an safety orientation, pre-job meeting or kick-off meeting provided by **NC Sturgeon** prior to any work beginning
- Monitor employees for substance abuse and report nonconformities to **NC Sturgeon**
- Ensure personnel have the required training and competency for their work
- Participate in **NC Sturgeon** tailgate safety meetings, job safety analysis or hazard assessments and on the job safety inspections.
- Perform a pre-job safety inspection that includes equipment
- Participate in the BBS hazard reporting system
- Report all injuries, spills, property damage incidents and near misses
- Comply with onsite and Owner Client safety rules
- Implement **NC Sturgeon** safety practices and processes as applicable
- Clean up and restore the worksite after the job is over
- Ensure compliance with regulations at all times
- Post job safety performance reviews shall be conducted for subcontractors.

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SUBCONTRACTOR SAFETY PRE-QUALIFICATION FORM

GENERAL INFORMATION				
1. Subcontractor Information:				
Subcontractor Name:		Telephone Number:		
Street Address:		Fax Number:		
City:		Website Address:		
Province/State:		Postal Code/Zip:		
2. Officers				
President:				
Vice President:				
Treasurer:				
3. How many years has your organization been in business under your present firm's name?				
4. Parent Firm Name:				
City:	Province/State:		Postal Code/Zip:	
Subsidiaries:				
5. Under current management since (Date): (please enter date as mm/dd/yyyy)				
6. Contact for Insurance Information:				
Title:	Telephone:	Fax:	Email:	
7. Insurance Carrier(s):				
Name		Type of Coverage		Telephone
8. Worker's Compensation Account Status (Please enclose a copy of your workers compensation insurance certificate.				
Account Number:		Industry Code:		
9. Contact for requesting bids:				
Title:	Telephone:	Fax:	Email:	
10. Contractor Evaluation form completed by:				
Title:	Telephone:	Fax:	Email:	

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HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE			
Health, Safety and Environmental Performance Provide the following data for your firm using your record keeping forms from the past three (3) years. If the data is not available please reply with Not Available - N/A.			
Safety Performance Definitions and Guidance			
a. Hours Worked Employee hours worked last three years. Please report actual scheduled total hours worked and total overtime hours worked. If actual hours worked are not available for certain individuals hours worked may be estimated. A default of 2000 hours per individual per year can be used as an estimate. b. Recordable Incidents Recordable cases are those that involve any work-related injury or illness, including death but excluding first-aid injuries. c. Lost Workday Cases A Lost Workday Case is a medical case that involves fatalities, days away from work cases or restricted work activity cases. Days Away from Work Case Where the employee is away from scheduled work day one day or more after the day of a work related injury or illness. The day of the incident does not count as lost workday. Stop count when total days away and restricted duty days reach 180 or employee leaves the firm. Restricted Work Activity Case Where the employee as result of work-related injury or illness: - Assigned to another job on a temporary or permanent basis or - Worked at their permanent job but less than a full day - Could not perform routine functions associated with their permanent job The day of the incident is not counted as a Restricted Duty day. Stop count when total days away or restricted duty days reach 180 or if employee leaves the firm. d. Motor Vehicle Incident A motor vehicle is any mechanically or electrically powered devices (excluding one moved by human power), upon which or by which any person or property may be transported upon a land roadway. Motor Vehicle Incident Includes any event involving a motor vehicle that is owned, leased or rented by the firm that results in death, injury or property damage unless the vehicle is properly parked.			
Health and Safety Incidents	2009	2008	2007
a. Total Hours Worked			
b. Total Recordable Incidents # Fatalities # Medical Aids # Days Away from Work Cases # Restricted Work Activity Cases			
c. Total Recordable Incident Rate (TRIR) Total # Recordable Incidents x 200,000 Total # Hours worked			
d. Lost Workday Cases (LWC) # Fatalities # Days Away from Work Case # Restricted Work Activity Case			
e. Lost Workday Incident Rate (LWDR) Total # Lost Workday Incidents x 200,000 Total # Hours Worked			

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HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE			
Health and Safety Incidents - continued	2009	2008	2007
f. Motor Vehicle Incidents (MVI) # Motor Vehicles Incidents # Kilometers/Miles driven			
g. Motor Vehicle Incident Frequency Rate (MVIFR) Total # of Firm's Motor Vehicle Incidents x 1,000,000 Total # Kilometers/Miles driven			
Environmental Incidents	2009	2008	2007
Total # Spills to Water a. Petroleum Spills # spills Sheen (est. volume as 0.1 bbl. To < 1bbl. # spills 1 bbl. To < 100 bbls. # spills 100 bbls. or more b. Chemical Spills # spills 1 bbl./160 kg. to < 100 bbls./16,000 kg. # spills 100 bbls./16,000 or more			
Total # Spills to Land a. Petroleum spills # spills 1 bbl. To < 100 bbls. # spills 100 bbls. or more b. Chemical Spills # spills 1 bbl./160 kg. to < 50 bbls./8,000 kg # spills 50 bbls./8,000 kg. or more			
Enforcement Actions	2009	2008	2007
Citations # Health and Safety # Environmental Please provide details			
Fines Total # Fines Total \$\$ Paid Please provide details			

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HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT			
Do you have a Job Safety Analysis (JSA) process in place?		Yes ☐	No ☐
Is there a Root Cause Analysis process used for investigations, near misses, environmental spills?		Yes ☐	No ☐
Is there a Management of Change (MOC) Process in place?		Yes ☐	No ☐
Do you have programs for the following?			
a. Respiratory Protection		Yes ☐	No ☐
b. Where applicable, have employees been:			
• Trained		Yes ☐	No ☐
• Fit tested		Yes ☐	No ☐
• Medically approved		Yes ☐	No ☐
c. Hazard communication/WHMIS		Yes ☐	No ☐
d. Programs for potential high hazard work such as Highly Hazardous Chemicals; Explosives and Blasting Agents		Yes ☐	No ☐
Do you have a corrective action process for addressing individual/employee safety and health performance deficiencies?		Yes ☐	No ☐
Medical			
a. Do you conduct medical examinations for:			
• Pre-placement Job Capability		Yes ☐	No ☐
• Pulmonary		Yes ☐	No ☐
• Respiratory		Yes ☐	No ☐
b. Describe how you intend to provide first aid and other medical services while on-site.			
Do you have personnel trained to perform first aid and CPR?		Yes ☐	No ☐
Personal Protective Equipment (PPE)			
a. Is applicable PPE provided for employees?		Yes ☐	No ☐
b. Do you have a program to assure that PPE is inspected and maintained?		Yes ☐	No ☐
HSE Meetings			Frequency
a. Do you hold site HSE meetings for?			
• Field Supervisors		Yes ☐	No ☐
• Employees		Yes ☐	No ☐
• New Hires		Yes ☐	No ☐
• Subcontractors		Yes ☐	No ☐

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HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT				
Inspections and Audits				Frequency
a.	Do you conduct internal HSE Inspections?	Yes ☐	No ☐	
b.	Do you conduct internal HSE program audits?	Yes ☐	No ☐	
c.	Are corrections or deficiencies to internal HSE program or equipment communicated and documented until closure?	Yes ☐	No ☐	
Equipment and Materials:				
a.	Do you own or lease Equipment and Materials? If yes, please complete the following questions:	Yes ☐	No ☐	
b.	Do you have a system for establishing applicable health, safety, and environmental specifications for acquisition of materials and equipment?	Yes ☐	No ☐	
c.	Do you conduct inspections on operating equipment (e.g., cranes, forklifts) in compliance with regulatory requirements?	Yes ☐	No ☐	
d.	Do you maintain operating equipment in compliance with regulatory requirements?	Yes ☐	No ☐	
e.	Do you maintain the applicable inspection and maintenance certification records for operating equipment?	Yes ☐	No ☐	
f.	Do you document corrections or deficiencies from equipment inspections and maintenance?	Yes ☐	No ☐	
Subcontractor Management				
a.	Do you subcontract any work? If the answer is yes, please complete the following questions:	Yes ☐	No ☒	
b.	Do you have a written contractor safety management process?	Yes ☐	No ☐	
c.	Do you use HSE performance criteria in selection of subcontractors?	Yes ☐	No ☐	
d.	Do you evaluate the ability of subcontractors to comply with applicable HSE requirements as part of the selection process?	Yes ☐	No ☐	
e.	Do your subcontractors have a written HSE Program?	Yes ☐	No ☐	
f.	Do you include your subcontractors in:			
	• HSE Orientation	Yes ☐	No ☐	
	• HSE Meetings	Yes ☐	No ☐	
	• HSE Equipment Inspections	Yes ☐	No ☐	
	• HSE Program Audits	Yes ☐	No ☐	
	• Are corrections or deficiencies documented	Yes ☐	No ☐	

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HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT					
Employee and Trades Training					
a.	Have employees been trained in appropriate job skills?	Yes ☐		No ☐	
b.	Are employees' job skills certified where required by regulatory or industry consensus standards?	Yes ☐		No ☐	
c.	List trades/crafts which have been certified:				
Health, Safety and Environmental Orientation		New Hires		Supervisors	
a.	Do you have an HSE Orientation Program for new hires and newly hired or promoted supervisors?	Yes ☐	No ☐	Yes ☐	No ☐
b.	Does the program provide instruction on the following:				
	• New worker orientation	Yes ☐	No ☐	Yes ☐	No ☐
	• Safe Work Practices	Yes ☐	No ☐	Yes ☐	No ☐
	• Safety Supervision	Yes ☐	No ☐	Yes ☐	No ☐
	• Toolbox meetings	Yes ☐	No ☐	Yes ☐	No ☐
	• Emergency Procedures	Yes ☐	No ☐	Yes ☐	No ☐
	• First Aid Procedures	Yes ☐	No ☐	Yes ☐	No ☐
	• Fire Protection and Prevention	Yes ☐	No ☐	Yes ☐	No ☐
	• Safety Intervention	Yes ☐	No ☐	Yes ☐	No ☐
	• Hazard Communication/WHMIS	Yes ☐	No ☐	Yes ☐	No ☐
Health, Safety and Environmental Training					
a.	Do you know the regulatory HSE training requirements for your employees?	Yes ☐		No ☐	
b.	Have your employees received the required HSE training and re-training	Yes ☐		No ☐	
c.	Do you have a specific HSE training program for supervisors?	Yes ☐		No ☐	
Training Records					
a.	Do you have HSE and training records for your Employee's?	Yes ☐		No ☐	
b.	Do the training records include the following:				
	• Employee identification	Yes ☐		No ☐	
	• Date of training	Yes ☐		No ☐	
	• Name of trainer	Yes ☐		No ☐	
	• Method used to verify understanding	Yes ☐		No ☐	
c.	How do you verify understanding of training? (Check all that apply)				
☐ Written test ☐ Oral test ☐ Performance test ☐ Job Monitoring ☐ Other (List)					

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Purpose

The purpose of this training program is to protect employees from safety hazards that may be encountered during work in trenches and excavations.

Scope

NC Sturgeon is required to participate as a contract employer at client locations with trenching and excavation work; however **NC Sturgeon** does not initiate trenching operations.

When work is performed on a non-owned or operated site, the operator's program shall take precedence; however, this document covers **NC Sturgeon** employees for basic awareness purposes that addresses all items and shall be used when an operator's program doesn't exist.

Definitions

Accepted engineering practices means the standards of practice required by a registered professional engineer.

Aluminum Hydraulic Shoring means a manufactured shoring system consisting of aluminum hydraulic cylinders (crossbraces) used with vertical rails (uprights) or horizontal rails (wales).

Bell-bottom pier hole means a type of shaft or footing excavation, the bottom of which is made larger than the cross section above to form a belled shape.

Benching (Benching system) is a method of protecting employees from cave-ins by excavating the sides of an excavation to form one or more horizontal steps, usually with vertical or near-vertical surfaces between levels.

Cave-in means the movement of soil or rock into an excavation, or the loss of soil from under a trench shield or support system, in amounts large enough to trap, bury, or injure and immobilize a person.

Cross braces mean the horizontal members of a shoring system installed from side to side of the excavation. The cross braces bear against either uprights or Wales.

Excavation means any man-made cut, cavity, trench, or depression in an earth surface formed by earth removal.

Faces or sides mean the vertical or inclined earth surfaces formed as a result of excavation work.

Failure means the movement or damage of a structural member or connection that makes it unable to support loads.

Hazardous atmosphere means an atmosphere that is explosive, flammable, poisonous, corrosive, oxidizing, irritating, oxygen deficient, toxic, or otherwise harmful, which may cause death, illness, or injury.

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Health Safety Officer means the individual at **NC Sturgeon** responsible for developing and implementing this program, conducting unannounced work site inspections, and ensuring that the departments comply with the program requirements.

Kickout means the accidental movement or failure of a cross brace.

Protective system means a method of protecting employees from cave-ins, from material that could fall or roll from an excavation face into an excavation, or from the collapse of adjacent structures. Protective systems include support systems, sloping and benching systems, shield systems, and other systems that provide the necessary protection.

Ramp means an inclined walking or working surface that is used to gain access to one point from another. A ramp may be constructed from earth or from structural materials such as steel or wood.

Sheeting means the members of a shoring system that retain the earth in position and in turn are supported by other members of the shoring system.

Shield (Shield system) means a structure used in an excavation to withstand cave-ins and which will protect employees working within the shield system. Shields can be permanent structures or portable units moved along as work progresses. Shields used in trenches are usually referred to as "trench boxes" or "trench shields."

Shoring (Shoring system) means a structure that is built or put in place to support the sides of an excavation to prevent cave-ins.

Sides. See "Faces."

Sloping (Sloping system) means sloping the sides of the excavation away from the excavation to protect employees from cave-ins. The required slope will vary with soil type, weather, and surface or near surface loads that may affect the soil in the area of the trench (such as adjacent buildings, vehicles near the edge of the trench and so forth).

Stable rock means natural solid mineral material that can be excavated with vertical sides that will remain intact while exposed.

Structural ramp means a ramp built of steel or wood, usually used for vehicle access. Ramps made of soil or rock are not considered structural ramps.

Support system means a structure such as underpinning, bracing, or shoring, which provides support to an adjacent structure, underground installation, or the sides of an excavation.

Tabulated data means tables and charts approved by a registered professional engineer and used to design and construct a protective system.

Trench (Trench excavation) means a narrow excavation (in relation to its length) made below the surface of the ground.

Trench box or shield. See "Shield".

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Uprights mean the vertical members of a trench shoring system placed in contact with the earth and usually positioned so that individual members do not contact each other. Uprights placed so that individual members are closely spaced, in contact with or interconnected to each other, are often called "sheeting."

Wales are horizontal members of a shoring system placed in the direction of the excavation face whose sides bear against the vertical members of the shoring system or earth (the uprights or sheeting).

Key Responsibilities

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her region is required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Only trained personnel can be involved in working in trenches or excavations. **NC Sturgeon** personnel DO NOT initiate trenching.

Procedure

Competent Person Duties – The Safety Manager or their designee shall have the following duties:

Protective Systems or Equipment

- Monitoring water removal equipment and operations.
- Removal of workers if conditions dictate.
- Atmospheric testing.
- Inspecting excavations subject to runoff from heavy rains to determine need for diversion ditches, dikes, or other suitable protection.
- Determining cave-in potential to assess need for shoring or other protective system.
- Examining damaged material or equipment used for protective systems to determine its suitability for continued use.
- Classifying soil and rock deposits, by both visual analysis and by testing, to determine appropriate protection; re-classifying, if necessary, based on changing conditions.
- Determining the appropriate slope of an excavation to prevent collapse due to surcharge loads from stored material or equipment, operating equipment, adjacent structures, or traffic, and assuring that such slope is achieved.

Inspecting Trench and Protective Systems

- Inspections prior to entry and authorizing immediate removal of employees from the hazardous area where evidence of possible cave-in, failure of protective systems, hazardous atmospheres, or other hazardous conditions exists.

Unsafe Access/Egress

- Designing structural ramps that are used solely by employees as a means of access or egress. Structural ramps used for access or egress of equipment must be designed by a competent person qualified in structural

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design.

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Utilities and Pre-work Site Inspection

The location of underground installations shall be determined before excavation.

When utility companies or owners cannot respond to a request to locate underground utility installations within 24 hours, or cannot establish exact location of these installations, **NC Sturgeon** may proceed, provided it does so with caution and provided detection equipment or other acceptable means to locate utility installations are used.

Excavation shall be done in a manner that does not endanger the underground installations or the employees engaged in the work. Utilities left in place shall be protected by barricades, shoring, suspension or other means as necessary to protect employees.

Protection of the Public

Barricades, walkways, lighting and posting shall be provided as necessary for the protection of the public prior to the start of excavation operations.

Guardrails, fences, or barricades shall be provided on excavations adjacent to walkways, driveways and other pedestrian or vehicle thoroughfares. Warning lights or other illumination shall be maintained as necessary for the safety of the public and employees from sunset to sunrise.

Wells, holes, pits, shafts and all similar hazardous excavations shall be effectively barricaded or covered and posted as necessary to prevent unauthorized access. All temporary excavations of this type shall be backfilled as soon as possible.

Protection Against Falls

Walkways or crossings shall be protected by standard guardrails or railings shall be provided where employees and the general public are permitted to cross over excavations. Where workers in the excavation may pass under these walkways or bridges, a standard guardrail and toe board shall be used.

Protection of Workers in Excavations

Access and Means of Egress

Stairs, ladders or ramps shall be provided where employees are required to enter trench excavations over 4 feet deep. The maximum distance of lateral travel (e.g., along the length of the trench) required to reach the means of egress shall not exceed 25 feet.

Structural Ramps

Structural ramps used solely by employees as a means of access or egress from excavations shall be designed by a competent person. Structural ramps used for access or egress of equipment shall be designed by a person qualified in structural design, and shall be constructed in accordance with the design.

Ramps and runways constructed of two or more structural members shall have the structural members connected together to prevent movement or displacement.

Structural members used for ramps and runways shall be of uniform thickness.

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Cleats or other appropriate means used to connect runway structural members shall be attached to the bottom of the runway or shall be attached in a manner to prevent tripping.

Structural ramps used in place of steps shall be provided with cleats or other surface treatments on the top surface to prevent slipping.

Ladders

When portable ladders are used, the ladder side rails shall extend a minimum of 3 feet above the upper surface of the excavation.

Ladders shall have nonconductive side rails if work will be performed near exposed energized equipment or systems.

Two or more ladders, or a double-cleated ladder, will be provided where 25 or more employees will be conducting work in an excavation where ladders serve as the primary means of egress, or where ladders serve two-way traffic.

Ladders will be inspected prior to use for signs of damage or defects. Damaged ladders will be removed from service and marked with "Do Not Use" until repaired.

Ladders shall be used only on stable and level surfaces unless secured. Ladders placed in any location where they can be displaced by workplace activities or traffic shall be secured, or barricades shall be used to keep these activities away from the ladder.

Non-self-supporting ladders shall be positioned so that the foot of the ladder is one-quarter of the working length away from the support.

Employees shall not be allowed to carry any object or load while on the ladder that could cause them to lose their balance and fall.

Exposure to Vehicular Traffic

Employees exposed to vehicular traffic shall be provided with, and shall wear vests or other suitable garments marked with or made of reflectorized or high-visibility material. Warning vests worn by flagmen shall be red or orange, and shall be of reflectorized material if worn during night work.

Employee Exposure to Falling Loads

No employee shall be permitted underneath loads (or where loads may fall) handled by lifting or digging equipment. Employees shall be required to stand away from any vehicle being loaded or unloaded to avoid being struck by any spillage or falling materials. Operators may remain in the cabs of vehicles being loaded or unloaded when the vehicles provide adequate protection for the operator during loading and unloading operations.

Warning System for Mobile Equipment

A warning system shall be used when mobile equipment is operated adjacent to the edge of an excavation if the operator does not have a clear and direct view of the edge of the excavation. The warning system shall consist of barricades, hand or mechanical signals, or stop logs. If possible, the grade should be away from the excavation.

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Hazardous Atmospheres

The atmosphere shall be tested for air contaminants (oxygen, flammable gases, etc.) in excavations over 4 feet deep or if a hazardous atmosphere exists or could reasonably be expected to exist. A hazardous atmosphere could be expected, for example, in excavations in landfill areas, in excavations in areas where hazardous substances are stored nearby, or in excavations near or containing gas pipelines.

Adequate precautions shall be taken to prevent employee exposure to atmospheres containing less than 19.5 percent oxygen and other hazardous atmospheres. These precautions include providing proper respiratory protection or forced ventilation of the workspace.

Forced ventilation will be provided where necessary to ensure the atmosphere is safe.

When controls are used that are intended to reduce the level of atmospheric contaminants to acceptable levels, continuous air monitoring will be performed. The device used for atmospheric monitoring shall be equipped with an audible and visual alarm.

Atmospheric testing will be performed using a properly calibrated direct reading gas monitor. Direct reading gas detector tubes or other acceptable means may also be used to test potentially toxic atmospheres.

Personal Protective Equipment

All employees working in trenches or excavations shall wear approved hard-hats and steel toed shoes or boots.

Employees exposed to flying fragments, dust, or other materials produced by drilling, sawing, sanding, grinding and similar operations shall wear approved safety glasses with side shields.

Employees exposed to hazards produced by, or performing, welding, cutting, or brazing operations shall wear approved spectacles or a welding faceshield or helmet.

Employees entering bell-bottom pier holes or other similar deep and confined footing excavations shall wear a harness with a lifeline securely attached to it. The lifeline shall be separate from any line used to handle materials and shall be individually attended at all times while the employee wearing the lifeline is in the excavation.

Employees shall wear approved gloves or other suitable hand protection.

Employees using, or working in the immediate vicinity of, hammer drills, masonry saws, jackhammers or similar high noise producing equipment shall wear suitable hearing protection.

Each employee at the edge of an excavation 6 feet or more deep shall be protected from falling. Fall protection shall be provided by guardrail systems, fences or barricades.

Emergency rescue equipment, such as breathing apparatus, a safety harness and line, and a basket stretcher shall be readily available where hazardous atmospheric conditions exist or may develop during work in an excavation. This equipment shall be attended when in use. Only personnel that have received approved training and have appropriate equipment shall attempt retrieval that would require entry into a hazardous atmosphere.

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Protection from Hazards Associated with Water Accumulation

Employees shall not work in excavations that contain or are accumulating water unless precautions have been taken to protect employees against the hazards posed by water accumulation. The precautions taken must include inspection by a competent person before work begins, special support or shield systems to protect from cave-ins, water removal to control the level of accumulating water or use of safety harnesses and lifelines.

If water is controlled or prevented from accumulating by the use of water removal equipment, the water removal equipment and operation shall be monitored by a competent person trained in the use of the equipment.

If excavation work interrupts the natural drainage of surface water (such as streams), diversion ditches, dikes, or other suitable means shall be used to prevent surface water from entering the excavation. Precautions shall also be taken to provide adequate drainage of the area adjacent to the excavation.

The competent person shall inform workers of the precautions or procedures that are to be followed if water accumulates or is accumulating in an excavation.

Stability of Adjacent Structures

The competent person will determine if the excavation work could affect the stability of adjoining buildings, walls, sidewalks or other structures.

Support systems (such as shoring, bracing, or underpinning) shall be used to assure the stability of structures and the protection of employees where excavation operations could affect the stability of adjoining buildings, walls, or other structures.

Excavation below the level of the base or footing of any foundation or retaining wall that could be reasonably expected to pose a hazard to employees shall not be permitted.

Protection of Employees from Falling Objects and Loose Rocks or Soil

Adequate protection shall be provided to protect employees from loose rock or soil that could pose a hazard by falling or rolling from an excavation face. Such protection shall consist of:

- Scaling to remove loose material;
- Installation of protective barricades, such as wire mesh or timber, at appropriate intervals on the face of the slope to stop and contain falling material; or
- Benching sufficient to contain falling material.

Excavation personnel shall not be permitted to work above one another where the danger of falling rock or earth exists.

Employees shall be protected from excavated materials, equipment or other materials that could pose a hazard by falling or rolling into excavations.

Protection shall be provided by keeping such materials or equipment at least 2 feet from the edge of excavations, by the use of restraining devices that are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both if necessary.

	NC Sturgeon Safety Management System		Doc No:	TRENCH
			Initial Issue Date	02/2016
			Revision Date:	Initial Version
			TRENCHING/SHORING/EXCAVATIONS	
Next Revision Date:	TBD			
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 9 of 10

Materials and equipment may, as determined by the competent person, need to be stored further than 2 feet from the edge of the excavation if a hazardous loading condition is created on the face of the excavation.

Materials piled, grouped or stacked near the edge of an excavation must be stable and self-supporting.

Using the following categories, soil is classified into different types, which determine the kind of cave-in protection required. Only a competent and trained person can determine the soil type by using these classifications.

- Grain sizes are usually classified into four types: gravel, sand, silt, clay. Gravel is the least stable, and clay is the most stable.
- Saturation is the amount of water that the soil is currently holding. Complete saturation is much less stable than soil that is only slightly damp. However, soil with no water content is unstable.
- Cohesiveness is a test that determines how well the soil sticks together. The more it sticks together, the more stable the trench walls will be. The field test usually consists of rolling the soil in your hand into the shape of a worm and observing how and when it separates.
- Unconfined compressive strength determines how much weight per square foot the soil can withstand. This will determine how easily the soil will shear and cave in

Soil Types

Soil classifications must be determined by testing and protective systems designed according to soil classifications.

- The most stable type of soil is Type A. It is dense and heavy and consists primarily of clay.
- Type B has a medium level of stability and is made of soils such as silt, sandy loam, and medium clay.
- The least stable soil is Type C, which consists of gravel, loamy sand, and soft clay.

Timber shoring or aluminum hydraulic shoring must be determined according to the appendixes A & C of 29 CFR 1926 (Excavations).

The devices should be used while in good repair and maintenance. If damaged they must be inspected.

Employees should be protected from hazards of falling, rolling or sliding materials or equipment. Shields should not be subjected to excessive forces and will be installed to protect employees from lateral loads. Employees are restricted from being in the shield when installing or removing. The shield must be designed to resist calculated trench forces.

Daily Inspection

The competent person shall conduct daily inspections of excavations, adjacent areas, and protective systems for evidence of a situation that could result in possible cave-ins, failure of protective systems, hazardous atmospheres or other hazardous conditions. An inspection shall be conducted by the competent person prior to the start of work and as needed throughout the shift. Inspections shall also be made after every rainstorm or other hazard increasing occurrence. These inspections are only required when the trench will be or is occupied by employees.

Where the competent person finds evidence of a situation that could result in a possible cave-in, failure of protective systems, hazardous atmosphere, or other hazardous conditions, exposed employees shall be immediately removed from the hazardous area until precautions have been taken to assure their safety.

	NC Sturgeon Safety Management System		Doc No:	TRENCH
			Initial Issue Date	02/2016
			Revision Date:	Initial Version
	TRENCHING/SHORING/EXCAVATIONS			Revision No.
Next Revision Date:				TBD
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 10 of 10

There shall be a written log of all inspections conducted. This log shall include the date, work site location, results of the inspection, and a summary of any action taken to correct existing hazards.

Training

All personnel involved in trenching or excavation work shall be trained in the requirements of this program and regulatory requirements.

Training shall be performed before the employee is assigned duties in excavations.

Retraining will be performed whenever work site inspections conducted by the competent person or Health Safety Officer indicate that an employee does not have the necessary knowledge or skills to safely work in or around excavations.

Training records shall include the date(s) of the training program, the instructor(s) of the training program, a copy of the written material presented, and the names of the employee(s) to whom the training was given.

	NC Sturgeon Safety Management System		Doc No:	SWA
			Initial Issue Date	01/2017
			Revision Date:	Initial Version
STOP WORK AUTHORITY			Revision No.	0
			Next Revision Date:	Insert Date
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 1 of 1

Purpose

The Stop Work Authority process involves a stop, notify, correct and resume approach for the resolution of a perceived unsafe condition, act, error, omission or lack of understanding that could result in a undesirable event. All COMPANY employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health, safety or environmental risks exist.

Scope

This program applies to all COMPANY projects and operations.

Key Responsibilities

- Employees are responsible to initiate a Stop Work Intervention when warranted and management is responsible to create a culture where SWA is exercised freely.
- Supervisors are responsible to ensure a culture is created where SWA is exercised and honored freely to resolve issues before operations resume and recognize proactive participation.
- Management must establish and support clear expectations to exercise SWA, create a culture where SWA is exercised freely and hold those accountable that chose not to comply with established SWA policies.

Stop Work Authority Procedure

- When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected personnel and supervision of the stop work issue, correct the issue and resume work when safe to do so.
- No work will resume until all stop work issues and concerns have been adequately addressed.
- Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated by the host nor by COMPANY.

Follow-Up

- All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.
- Stop Work reports shall be reviewed by supervision order to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learning.
- It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.

Training

Employees shall receive Stop Work Authority training before their initial assignment. The training will be documented including the employee name, the dates of training and subject matter.

OSHA Form 300

Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes

Year 20 12
 Department of Consumer & Business Services
 Oregon Occupational Safety & Health Division (OR-OSHA)

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity, job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related illnesses that are diagnosed by a physician or licensed health-care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in OAR 437-001-0700. Use more lines for each case if needed. You must complete an Injury and Illness Incident Report (DCBS form 801) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OR-OSHA office for help.

Establishment name: NC Sturgeon

City: Midland State: Texas

Identify the person		Describe the case		Classify the case				Enter the number of days the injured / worker was:		Enter "1" in the "injury" column or choose one type of illness:* (M)							
(A) Case no.	(B) Employee's name	(C) Job title (e.g., "welder")	(D) Date of injury or illness	(E) Where the event occurred (e.g., "loading dock - north end")	(F) Describe Injury/Illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., "second degree burns on right forearm from acetylene torch")	Using these 4 categories, enter "1" in only the most serious result for each case:*											
						Death	Days away from work	Job transfer or restriction	Remained at work			Injury	Skin disorder	Respiratory condition	Poisoning	Hearing Loss	All other illnesses
						(G)	(H)	(I)	(J)	Away from work (K)	On job transfer or restriction (L)	(1)	(2)	(3)	(4)	(5)	(6)
01	Samual Palanko	Lead	06/02	Roof	Employee Slipped and fell off the roof, fracturing his jaw.	0	1	0	0	15 days	0 days	1	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
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						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
Page Totals						0	1	0	0	15 days	0 days	1	0	0	0	0	0

Injury
 Skin disorder
 Respiratory condition
 Poisoning
 Hearing Loss
 All other illnesses
 (1) (2) (3) (4) (5) (6)

Be sure to transfer these totals to the Summary (OSHA Form 300A) before you post it
 * Using "1" instead of an "x" allows the columns to total automatically.

OSHA Form 300A

Summary of Work-Related Injuries and Illnesses

Year 20 12

Department of Consumer & Business Services
Oregon Occupational Safety &
Health Division (OR-OSHA)

Form approved OMB no. 1218-0176

All establishments covered by OAR 437-001-0700 must complete this Summary, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log: count the individual entries you made for each category, write the totals below, make sure you've added the entries from every page of the Log. If you haven't had any cases, write "0".

Employees, former employees, and their representatives, have the right to review the OSHA Form 300 in its entirety. They also have limited access to the DCBS Form 801 or its equivalent. See OAR 437-001-0700(20)

Number of Cases

Total number of deaths

0

(G)

Total number of cases
with days away from work

1

(H)

Total number of
cases with job
transfer or restriction

0

(I)

Total number of
other recordable cases

0

(J)

Number of Days

Total number of days
away from work

15

(K)

Total number of days
of job transfer or restriction

0

(L)

Injury and Illness Types

Total number of...
(M)

(1) Injuries

1

(2) Skin disorders

0

(3) Respiratory conditions

0

(4) Poisonings

0

(5) Hearing Loss

0

(6) All other illnesses

0

Establishment Information

Your establishment name NC Sturgeon

Street 2800 Windecker Street

City Midland State TX ZIP 79711

Industry description (e.g., *Manufacturer of motor truck trailers*)
General Contractor, Steel Erection

Standard Industrial Classification (NAICS), if known
(e.g., 336212)
23 62 20

Employment Information (If you don't have these figures, see the worksheet on the back of this page to estimate.)

Annual average number of employees 46

Total hours worked by all employees last year 234,266

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that, to the best of my knowledge, the entries are true, accurate, and complete.

Russ Poster
Company Executive

HS&E Manager
Title

Phone: (903) 521-8825 Date: 1 / 17 / 2013

Keep this Summary posted from February 1 to April 30 of the year following the year covered by this form.

OSHA Form 300

Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes

Year 20 13
 Department of Consumer & Business Services
 Oregon Occupational Safety & Health Division (OR-OSHA)

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity, job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related illnesses that are diagnosed by a physician or licensed health-care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in OAR 437-001-0700. Use more lines for each case if needed. You must complete an Injury and Illness Incident Report (DCBS form 801) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OR-OSHA office for help.

Establishment name: NC Sturgeon

City: Midland State: Texas

Identify the person			Describe the case			Classify the case				Enter the number of days the injured / worker was:		Enter "1" in the "injury" column or choose one type of illness:* (M)					
(A) Case no.	(B) Employee's name	(C) Job title (e.g., "welder")	(D) Date of injury or illness	(E) Where the event occurred (e.g., "loading dock - north end")	(F) Describe Injury/Illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., "second degree burns on right forearm from acetylene torch")	Using these 4 categories, enter "1" in only the most serious result for each case:*				Away from work On job transfer or restriction		Injury Skin disorder Respiratory condition Poisoning Hearing Loss All other illnesses					
						Death	Days away from work	Remained at work									
								Job transfer or restriction	Other recordable cases								
(G)	(H)	(I)	(J)	(K)	(L)	(1)	(2)	(3)	(4)	(5)	(6)	(1)	(2)	(3)	(4)	(5)	(6)
n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0 days	0 days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
Page Totals						0	0	0	0	0 days	0 days	0	0	0	0	0	0

Be sure to transfer these totals to the Summary (OSHA Form 300A) before you post it
 * Using "1" instead of an "x" allows the columns to total automatically.

OSHA Form 300A

Summary of Work-Related Injuries and Illnesses

Year 20 13

Department of Consumer & Business Services
Oregon Occupational Safety &
Health Division (OR-OSHA)

Form approved OMB no. 1218-0176

All establishments covered by OAR 437-001-0700 must complete this Summary, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log: count the individual entries you made for each category, write the totals below, make sure you've added the entries from every page of the Log. If you haven't had any cases, write "0".

Employees, former employees, and their representatives, have the right to review the OSHA Form 300 in its entirety. They also have limited access to the DCBS Form 801 or its equivalent. See OAR 437-001-0700(20)

Number of Cases

Total number of deaths

Total number of cases
with days away from work

Total number of
cases with job
transfer or restriction

Total number of
other recordable cases

0

(G)

0

(H)

0

(I)

0

(J)

Number of Days

Total number of days
away from work

Total number of days
of job transfer or restriction

0

(K)

0

(L)

Injury and Illness Types

Total number of...
(M)

(1) Injuries

0

(4) Poisonings

0

(2) Skin disorders

0

(5) Hearing Loss

0

(3) Respiratory conditions

0

(6) All other illnesses

0

Establishment Information

Your establishment name NC Sturgeon

Street 2800 Windecker Street

City Midland State TX ZIP 79711

Industry description (e.g., *Manufacturer of motor truck trailers*)
General Contractor, Steel Erection

Standard Industrial Classification (NAICS), if known
(e.g., 336212)
23 62 20

Employment Information (If you don't have these figures, see the worksheet on the back of this page to estimate.)

Annual average number of employees 54

Total hours worked by all employees last year 186,160

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that, to the best of my knowledge, the entries are true, accurate, and complete.

Russ Poster

Company Executive

HS&E Manager

Title

Phone: (903) 521-8825

Date: 1 / 21 / 2014

Keep this Summary posted from February 1 to April 30 of the year following the year covered by this form.

OSHA Form 300

Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes

Year 20 14
 Department of Consumer & Business Services
 Oregon Occupational Safety & Health Division (OR-OSHA)

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity, job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related illnesses that are diagnosed by a physician or licensed health-care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in OAR 437-001-0700. Use more lines for each case if needed. You must complete an Injury and Illness Incident Report (DCBS form 801) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OR-OSHA office for help.

Establishment name: NC Sturgeon

City: Midland State: Texas

Identify the person		Describe the case		Classify the case		Enter the number of days the injured / worker was:		Enter "1" in the "injury" column or choose one type of illness:* (M)									
(A) Case no.	(B) Employee's name	(C) Job title (e.g., "welder")	(D) Date of injury or illness	(E) Where the event occurred (e.g., "loading dock - north end")	(F) Describe Injury/Illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., "second degree burns on right forearm from acetylene torch")	Using these 4 categories, enter "1" in only the most serious result for each case:*											
						Death	Days away from work	Job transfer or restriction	Other recordable cases			Injury	Skin disorder	Respiratory condition	Poisoning	Hearing Loss	All other illnesses
						(G)	(H)	(I)	(J)	(K)	(L)	(1)	(2)	(3)	(4)	(5)	(6)
n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0 days	0 days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
Page Totals						0	0	0	0	0 days	0 days	0	0	0	0	0	0
												Injury	Skin disorder	Respiratory condition	Poisoning	Hearing Loss	All other illnesses
												(1)	(2)	(3)	(4)	(5)	(6)

Be sure to transfer these totals to the Summary (OSHA Form 300A) before you post it
 * Using "1" instead of an "x" allows the columns to total automatically.

OSHA Form 300A

Summary of Work-Related Injuries and Illnesses

Year 20 14

Department of Consumer & Business Services
Oregon Occupational Safety &
Health Division (OR-OSHA)

Form approved OMB no. 1218-0176

All establishments covered by OAR 437-001-0700 must complete this Summary, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log: count the individual entries you made for each category, write the totals below, make sure you've added the entries from every page of the Log. If you haven't had any cases, write "0".

Employees, former employees, and their representatives, have the right to review the OSHA Form 300 in its entirety. They also have limited access to the DCBS Form 801 or its equivalent. See OAR 437-001-0700(20)

Number of Cases

Total number of deaths

0

(G)

Total number of cases
with days away from work

0

(H)

Total number of
cases with job
transfer or restriction

0

(I)

Total number of
other recordable cases

0

(J)

Number of Days

Total number of days
away from work

0

(K)

Total number of days
of job transfer or restriction

0

(L)

Injury and Illness Types

Total number of...
(M)

(1) Injuries

0

(4) Poisonings

0

(2) Skin disorders

0

(5) Hearing Loss

0

(3) Respiratory conditions

0

(6) All other illnesses

0

Establishment Information

Your establishment name NC Sturgeon

Street 2800 Windecker Street

City Midland State TX ZIP 79711

Industry description (e.g., *Manufacturer of motor truck trailers*)
General Contractor, Steel Erection

Standard Industrial Classification (NAICS), if known
(e.g., 336212)
23 62 20

Employment Information (If you don't have these figures, see the worksheet on the back of this page to estimate.)

Annual average number of employees 69

Total hours worked by all employees last year 177,421

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that, to the best of my knowledge, the entries are true, accurate, and complete.

Russ Poster
Company Executive

HS&E Manager
Title

Phone: (903) 521-8825 Date: 1 / 7 / 2015

Keep this Summary posted from February 1 to April 30 of the year following the year covered by this form.

OSHA Form 300

Log of Work-Related Injuries and Illnesses

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes

Year 20 15
 Department of Consumer & Business Services
 Oregon Occupational Safety & Health Division (OR-OSHA)

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity, job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related illnesses that are diagnosed by a physician or licensed health-care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in OAR 437-001-0700. Use more lines for each case if needed. You must complete an Injury and Illness Incident Report (DCBS form 801) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OR-OSHA office for help.

Establishment name: NC Sturgeon

City: Midland State: Texas

Identify the person		Describe the case		Classify the case		Enter the number of days the injured / worker was:		Enter "1" in the "injury" column or choose one type of illness:* (M)									
(A) Case no.	(B) Employee's name	(C) Job title (e.g., "welder")	(D) Date of injury or illness	(E) Where the event occurred (e.g., "loading dock - north end")	(F) Describe Injury/Illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., "second degree burns on right forearm from acetylene torch")	Using these 4 categories, enter "1" in only the most serious result for each case:*											
						Death	Days away from work	Job transfer or restriction	Other recordable cases			Injury	Skin disorder	Respiratory condition	Poisoning	Hearing Loss	All other illnesses
						(G)	(H)	(I)	(J)	(K)	(L)	(1)	(2)	(3)	(4)	(5)	(6)
n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0 days	0 days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
Page Totals						0	0	0	0	0 days	0 days	0	0	0	0	0	0
												Injury	Skin disorder	Respiratory condition	Poisoning	Hearing Loss	All other illnesses
												(1)	(2)	(3)	(4)	(5)	(6)

Be sure to transfer these totals to the Summary (OSHA Form 300A) before you post it
 * Using "1" instead of an "x" allows the columns to total automatically.

OSHA Form 300A

Summary of Work-Related Injuries and Illnesses

Year 20 15

Department of Consumer & Business Services
Oregon Occupational Safety &
Health Division (OR-OSHA)

Form approved OMB no. 1218-0176

All establishments covered by OAR 437-001-0700 must complete this Summary, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log: count the individual entries you made for each category, write the totals below, make sure you've added the entries from every page of the Log. If you haven't had any cases, write "0".

Employees, former employees, and their representatives, have the right to review the OSHA Form 300 in its entirety. They also have limited access to the DCBS Form 801 or its equivalent. See OAR 437-001-0700(20)

Number of Cases

Total number of deaths

Total number of cases
with days away from work

Total number of
cases with job
transfer or restriction

Total number of
other recordable cases

0

(G)

0

(H)

0

(I)

0

(J)

Number of Days

Total number of days
away from work

Total number of days
of job transfer or restriction

0

(K)

0

(L)

Injury and Illness Types

Total number of...
(M)

(1) Injuries 0

(2) Skin disorders 0

(3) Respiratory conditions 0

(4) Poisonings 0

(5) Hearing Loss 0

(6) All other illnesses 0

Establishment Information

Your establishment name NC Sturgeon

Street 2800 Windecker Street

City Midland State TX ZIP 79711

Industry description (e.g., Manufacturer of motor truck trailers)
General Contractor, Steel Erection

Standard Industrial Classification (NAICS), if known
(e.g., 336212)
23 62 20

Employment Information (If you don't have these figures, see the worksheet on the back of this page to estimate.)

Annual average number of employees 72

Total hours worked by all employees last year 176,586

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that, to the best of my knowledge, the entries are true, accurate, and complete.

Russ Poster HS&E Manager
Company Executive Title

Phone: (903) 521-8825 Date: 1 / 24 / 2016

Keep this Summary posted from February 1 to April 30 of the year following the year covered by this form.

Log of Work-Related Injuries and Illnesses

Year 20 16

Department of Consumer & Business
Services
Oregon Occupational Safety &
Health Division (OR-OSHA)

Establishment name: NC Sturgeon

City: Midland State: Texas

Identify the person				Describe the case		Classify the case											
(A) Case no.	(B) Employee's name	(C) Job title <i>(e.g., "welder")</i>	(D) Date of injury or illness	(E) Where the event occurred <i>(e.g., "loading dock - north end")</i>	(F) Describe Injury/Illness, parts of body affected, and object/substance that directly injured or made person ill <i>(e.g., "second degree burns on right forearm from acetylene torch")</i>	Using these 4 categories, enter "1" in only the most serious result for each case:*				Enter the number of days the injured / worker was:		Enter "1" in the "injury" column or choose one type of illness:*(M)					
						Death	Days away from work	Remained at work				Injury	Skin disorder	Respiratory condition	Poisoning	Hearing Loss	All other illnesses
								Job transfer or restriction	Other recordable cases								
						(G)	(H)	(I)	(J)	(K)	(L)	(1)	(2)	(3)	(4)	(5)	(6)
n/a	n/a	n/a	n/a	n/a	n/a	0	0	0	0	0 days	0 days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
						0	0	0	0	days	days	0	0	0	0	0	0
Page Totals						0	0	0	0	0 days	0 days	0	0	0	0	0	0
Be sure to transfer these totals to the Summary (OSHA Form 300A) before you post it * Using "1" instead of an "x" allows the columns to total automatically.												Injury	Skin disorder	Respiratory condition	Poisoning	Hearing Loss	All other illnesses
Page 1 of 2												(1)	(2)	(3)	(4)	(5)	(6)

OSHA Form 300A

Summary of Work-Related Injuries and Illnesses

Year 20 16

Department of Consumer & Business Services
Oregon Occupational Safety &
Health Division (OR-OSHA)

Form approved OMB no. 1218-0176

All establishments covered by OAR 437-001-0700 must complete this Summary, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

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Number of Cases

Total number of deaths

0

(G)

Total number of cases
with days away from work

0

(H)

Total number of
cases with job
transfer or restriction

0

(I)

Total number of
other recordable cases

0

(J)

Number of Days

Total number of days
away from work

0

(K)

Total number of days
of job transfer or restriction

0

(L)

Injury and Illness Types

Total number of...
(M)

(1) Injuries

0

(4) Poisonings

0

(2) Skin disorders

0

(5) Hearing Loss

0

(3) Respiratory conditions

0

(6) All other illnesses

0

Establishment Information

Your establishment name NC Sturgeon

Street 2800 Windecker Street

City Midland State TX ZIP 79711

Industry description (e.g., *Manufacturer of motor truck trailers*)
General Contractor, Steel Erection

Standard Industrial Classification (NAICS), if known
(e.g., 336212)
23 62 20

Employment Information (If you don't have these figures, see the worksheet on the back of this page to estimate.)

Annual average number of employees 45

Total hours worked by all employees last year 100,855

Sign here

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I certify that I have examined this document and that, to the best of my knowledge, the entries are true, accurate, and complete.

Russ Poster
Company Executive

HS&E Manager
Title

Phone: (903) 521-8825 Date: 1 / 25 / 2017

Keep this Summary posted from February 1 to April 30 of the year following the year covered by this form.