



STOCKDALE
BUILDING GROUP

CORPORATE SAFETY MANUAL

JULY 2005

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CORPORATE SAFETY MANUAL

STOCKDALE BUILDING GROUP, LLC POLICY STATEMENT

The safety and health of our employees is important to the executive management of Stockdale Building Group, LLC. The success of the safety program depends on management's commitment to provide a safe working environment free of recognizable hazards for all employees. Safety is the responsibility of all employees and management has the responsibility to enforce the safety rules and regulations.

Safety rules and practices must be understood and enforced, personal protective equipment provided and used properly, training and education programs must be developed and implemented, and hazards identified and corrected. These are all important parts of the safety program and it is management's responsibility to implement them.

Management must take the lead by setting the example and implementing and enforcing the safety program. This is the only way to achieve the full cooperation of each employee, which is a critical need for an effective safety program.

Safety has to be an integral part of everyone's daily work activities, not something that is considered after a problem arises.

To reinforce the important role safety plays in our operations all levels of management must be held responsible and accountable for the safety performance of the people they supervise.

Safety is an area where we must continually strive for improvement. Changes must be made in the safety program as required to improve our safety performance.

Do not assume all safety requirements are included in this safety program that follows. Special or unusual conditions may warrant additional safeguards. When such conditions arise it is the employee's responsibility to respond in a safe manner and to inform their superintendent or management so that appropriate safeguards can be developed and implemented. There are also federal, state, local, and client requirements applicable to various operations and projects.

SBG seeks to provide its client with a quality product and services through the safe implementation of project work. SBG management expects all employees to abide by this general policy.

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SECTION I RESPONSIBILITIES

A. President / Safety Director

Responsible for the safety performance of all projects and all Project Managers.

Responsibilities include:

1. Ensures company safety programs are administered and complied with on all projects.
2. Reviews safety performance of Project Managers.
3. Reviews accidents with and Project Managers and implements corrective action to prevent reoccurrence.
4. Maintains an open line of communication with all Project Managers with regards to safety.
5. Inspects projects as required to ensure compliance with safety programs and other applicable rules and regulations.
6. Reviews prior to implementation safety procedures that may be required on projects.
7. Establishes a clear understanding with each Project manager as to responsibilities and specific duties. Ensures necessary follow up action is taken as required and that Project managers comply with safety responsibilities and duties.

B. Project Manager

Responsible for the administration and implementation of the company safety programs on a particular project.

Responsibilities include:

1. Administer company safety programs and any additional safety requirements deemed necessary by the President / Safety Director.
3. Requires compliance with applicable safety rules and regulations and takes the necessary actions to correct any hazards discovered on the project.
4. Develops and implements any additional safety requirements needed for special or unusual hazards.
5. Reviews individual safety performance of project sub-contractors and implements actions required to improve performance.

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B. Project Manager (cont.)

6. Ensures accident investigations and reporting for all disabling injuries are completed according to the safety program requirements.
7. Reviews with President / Safety Director results on any OSHA or state safety inspections. Should any safety violations be discovered, the Project Manager takes the necessary corrective action to ensure compliance with applicable codes and regulations.
8. Participates in pre-job safety survey prior to start of a project. Develops necessary safe work practices and ensures follow-up action.

C. Project Superintendent

Responsible for enforcing safety program in areas with sub-contractors under his/her direct supervision.

1. Enforcement of entire safety program and any special safe work procedures deemed necessary for unusual conditions or hazards in his/her assigned area.
2. Maintains an open line of communication with sub-contractors pertaining to safety.
3. Enforces compliance with safety rules and regulations through safety inspections and daily observations.
4. Ensures that mandatory safety equipment is properly used as required per specific tasks
5. Assists Project Manager in the investigation of all work related disabling injuries.
6. Assists Project Manager in arranging safety orientation, safety training and safety meetings.
7. Assists Project Manager in implementing inspection schedules as required.
8. Maintains an effective housekeeping program on projects under his supervision. Take any necessary corrective actions.
9. Participates in sub-contractors safety meetings.

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SECTION II

SAFETY PROGRAM

A. Safety Rules

This manual is for the use of all Stockdale Building Group, LLC employees. Every employee is to receive training on this manual. Also, employees will receive an employee handbook when hired and is responsible for familiarizing himself/herself with the contents.

The safety rules for Stockdale Building Group, LLC are contained in the safety manual. Employees must be trained regarding safety and this manual is to be used as the textbook for safety training. Project Superintendents, at their safety meetings, will devote a certain amount of time covering specific topics in the safety manual with their sub-contractors. Management will implement this training program and ensure that it is followed and documented.

B. Safety Bulletins

Safety Bulletins cover specific topics and provide information concerning safe work practices for various situations and the safe use of certain types of equipment. Safety bulletins are to be used as a reference source and, as a training guide when situations arise. Safety bulletins are a permanent record and source of information to be used by Project Superintendents. There will be frequent additions to the safety bulletin section of the safety program as new procedures, regulations and safe work practices are developed.

C. Safety Meetings

Safety meetings are an integral part of the safety program. These meetings shall be used to train employees at all levels. All safety meetings must be documented and their importance cannot be overstated.

D. Safety Procedures for Subcontractors

Each subcontractor is required by federal and state occupational safety and health regulations, standards, codes, and rules in addition to contractual agreements to provide a safe and healthful work environment for its employees, to protect the customer's employees and property, to protect the employees and property of other contractors and to protect the public where there is exposure from the subcontractor's operations.

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1. Safety Program

Each subcontractor and/or its subcontractors shall be required to follow the safety program of Stockdale Building Group, LLC. Subcontractors may follow their own written program if that program is deemed at least as stringent as SBG's Policies.

2. Pre-Job Meeting

Each subcontractor and/or its subcontractors will meet with Project Superintendent to review project safety procedures. Topics discussed at this meeting shall include, but are not limited to:

- a. Safety meetings and safety orientations.
- b. Emergency procedures.
- c. Record keeping requirements.
- d. Accident reporting.
- e. Customer rules and regulations.
- f. Special hazards.
- g. Personal protective equipment.
- h. Any others deemed necessary by project supervision.

This meeting shall be documented and signed by those present.

3. Accident Reporting

Subcontractors shall provide Stockdale Building Group with a copy of all accident reports for injuries, property damage, or near misses.

4. Medical Treatment

Each subcontractor will have standing agreements with a doctor, hospital, or clinic for immediate transportation and treatment, if necessary, for employees injured on the project. Each subcontractor shall have the required personnel and equipment for first aid treatment of their employees. The subcontractor and/or its subcontractors shall furnish Stockdale Building Group Project Superintendent with their project first aid and medical procedures.

E. Pre-Job Safety Surveys

Prior to work commencing on a project, the Project Superintendent shall conduct a pre-job safety survey. The pre-job safety survey is to be completed at this time along with any safe work practices required for any unusual conditions or special hazards. The safe work practices developed for unusual conditions or special hazards when required, must be written and approved procedures.

The Project Superintendent is responsible for establishing a plan or schedule for instructing subcontractors of the hazards involved and safe work practices developed as a result of the pre-job safety survey. The sub-contractors are responsible for instructing their crews.

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It is understood that there will be emergency work and small jobs started that will not have formal pre-job surveys because of the time element or size of the job. However, the requirement for a pre-job safety survey must be adhered to for large projects.

Small projects with unusual conditions or special hazards, which would make them other than a normal project, may require a pre-job safety survey. This will be determined on a case-by-case basis by the Project Superintendent and the Project Manager.

F. Personal Protective Equipment

The personal protective equipment (PPE) furnished on projects has been designed and manufactured in accordance with applicable codes and standards when used for its intended use. It is the Project Superintendent's responsibility to ensure that PPE is used properly and kept in good repair.

The Project Superintendent is responsible to ensure that the necessary PPE is available on the job site, used when required.

1. Head Protection

Every employee and every visitor is required to wear approved hard-hats on the project. Alterations such as vent holes and un-approved painting can reduce the protection provided by these safety hard-hats and are strictly prohibited. Hard-hats showing cracks, damaged rims, excessive discoloration, or any other signs of damage, shall be removed from service and destroyed.

2. Eye Protection

The Project Superintendent is responsible to ensure that the proper eye protection for the hazards to which employees are exposed is available, in good condition, and is used as required. Many types of eye protection are available including safety glasses, goggles, face shields and others. All eye protection must be used as designed and provide protection for the hazardous exposure.

3. Safety Harnesses

Safety belts are not allowed. Full body harnesses must be used when working above 6 feet. The sub-contractor is required to inspect safety harnesses used by employees under their supervision prior to and after the intended use. Employees must be instructed to report any defects immediately. Any safety harnesses or lanyards found with defects or showing signs of deterioration shall be immediately removed from service.

4. Special Protective Equipment

Certain instances will require the use of special PPE such as respirators, protective clothing, hearing protection, etc. When hazards arise requiring this equipment the sub-contractor must ensure that it is available, in good working condition, used as required and that employees are trained in the proper use and limitations of this special PPE.

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G. Inspections

Cranes, forklifts, front-end loaders, backhoes, tractors, compressors, welding machines, and any other piece of major equipment shall receive a thorough inspection before use at the job site. The sub-contractor to whom the equipment belongs shall be responsible for the inspection. After the initial inspection, the sub-contractor shall make periodic inspection of the equipment.

The Project Superintendent will implement and maintain an inspection schedule on the project that will include the following items:

1. Equipment

Includes all major equipment, power tools, hand tools, extension cords, electrical equipment, pneumatic equipment, safety equipment, and rigging equipment.

2. Housekeeping

Includes walkways, work areas, storage areas and warehouses.

3. Scaffolds and Ladders

Includes all types of scaffolding, work platforms, and ladders. Inspect for handrails, mid-rails, safe access, structural soundness, proper use, broken rungs, and safe access.

4. Fire Protection

Includes fire hazards, fire fighting equipment, utilities, temporary heating devices and any special fire hazards.

H. Bulletin Boards

Each job site where trailers are set up may have a safety bulletin board. The bulletin board is to be placed in an area that is easily and clearly seen by employees.

Only current safety bulletins, posters, etc. should be posted. Outdated material is to be removed and the bulletin board must be kept neat and uncluttered by the Project Superintendent.

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I. Safety Performance

The safety performance will be measured using the OSHA incident rate for disabling (lost workday) injuries/illness and the incidence rate for all OSHA recordable injuries/illnesses. The incidence rates are calculated using the following formulas:

$$\text{Disabling injury incidence rate} = \frac{\text{No. of Disabling Injuries} \times 200,000}{\text{Man-hours Worked}}$$

$$\text{Recordable injury incidence rate} = \frac{\text{No. of Recordable Injuries} \times 200,000}{\text{Man-hours Worked}}$$

These incidence rates relate the number of injuries and illnesses to a common exposure base of 100 full time workers, working 40 hours/week, 50 weeks/year. This common exposure base allows inter-industry comparisons, trend analysis and project comparisons.

Determinations as to what constitutes a recordable injury/illness or disabling injury/illness are covered in the accident reporting and investigation section and in Safety Bulletin No. 7 - OSHA Record-keeping.

1. Safety Performance Reports

This report is published monthly and will contain the safety performance of each project for the previous month and year-to-date. The disabling and recordable injury/illness incidence rates will be used to measure this performance.

J. Medical Arrangements

Prior to the start of a project, emergency telephone numbers shall be posted near each telephone. It shall have the telephone numbers of the ambulance service, rescue squad when applicable, hospital, physician, fire department and police. All sub-contractors must be informed of emergency procedures during the safety orientation.

K. Accident Reporting and Investigation

Each accident resulting in injury to an employee, injury to an individual not an employee but occurring on our project or property damage must be promptly and correctly reported and investigated. All near-miss incidents are to be reported and investigated as well. It is the responsibility of the Project Manager to ensure the reports and investigations are completed according with safety program guidelines.

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1. OSHA Recordkeeping and Requirements

OSHA requires that two forms be used to meet the Recordkeeping requirements. The first is form OSHA 300 log that is the Log of Occupational Injuries and Illnesses. This form serves two purposes, it is a listing of all OSHA recordable injuries and illnesses occurring during the calendar year. The form also serves as the summary that must be posted at the end of the year. The log itself doesn't have to be posted, only the summary, which must be posted by February first, for all recordable injuries and illnesses from the previous year. The second form is the OSHA 301 Form, Supplementary Record of Occupational Injuries and Illnesses. The first reports of injury or illness that we file with our Worker's Compensation Insurance Carrier or State Funds meets all of the requirements for the OSHA 301 Form, thus it is not necessary to use the 301 form if these first reports of injury forms are used.

OSHA requires each fixed place of employment (project location) to keep these records. This means each job site where a trailer is set up will have to keep and maintain these records. The OSHA 300 Log is the first thing an OSHA inspector will ask to see, so it must be kept up to date. When the project is completed, these records are to be sent to the President / Safety Director. The actual mechanics of completing these forms, examples, and what constitutes a recordable injuries or illnesses is discussed in detail in Safety Bulletin No. 7.

2. First Aid Report Of All Injuries

Each injury to an employee, no matter how minor or how severe, must be recorded on this form. The form is self explanatory and must be filled out completely, including the job location, the date the injury occurred, date reported, nature of injury, causes, the injured's foreman, and the case number. (This case number is the same case number that is on the first report of injury). At the end of each month a copy of the form is to be sent to the President / Safety Director at the corporate office with the original kept on the site. Each injury or illness must be entered promptly. This is an in- house form and is not to be sent to any outside agencies.

3. Accident Investigation Report

This report must also be completed for all injuries or illnesses resulting in lost work days and fatalities. This accident investigation report is an internal document and is not to be given to any outside agency. A copy of this report is to be sent to the President / Safety Director and a copy kept on file at the job site. This report must be completed on the same day for each occupational injury or illness resulting in lost workdays.

The accident investigation report must be filled out completely. This report will not only be used to discover causes of accidents and to correct them, but the information on the report will be used for accident analysis, and costs. It is imperative that the report be completed properly.

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4. Properties or Equipment Damage/Loss Report

Damages caused by wrecks, equipment failures, fires, theft, flood, wind, etc. to equipment or property must be investigated and reported on the property or equipment damage/loss report. One copy of this report is kept on the project site with a copy sent to the Safety Director at the Corporate Office.

A complete list and values of equipment stolen or property damaged or stolen must be included with this report. Should the damage to equipment or property be the result of an accident, a thorough investigation must be completed, to find the cause along with recommendations to prevent reoccurrence. When there is the slightest possibility that Stockdale Building Group, LLC. will be involved in the claim, serious damage to property or equipment must be reported immediately to the President / Safety Director. It is imperative that these cases be thoroughly investigated, witness statements taken and photographed.

5. Injuries to Third Parties (Non-Employees)

Injuries to owner representatives, visitors, employees of other contractors, or members of the public where there is the slightest possibility Stockdale Building Group LLC, may be claimed to be involved, must be investigated thoroughly. Photographs of the area shall be taken when possible, a sketch of the area made, witness statements taken and the Stockdale Building Group accident investigation form completed. Note on the accident investigation report that the injured is not a Stockdale Building Group employee. The investigation must take place as soon as possible after the injury occurred and the President / Safety Director notified immediately.

6. Lost Time or Fatal Injuries

All lost time injuries and fatal must be reported to the President / Safety Director as soon as possible after the accident took place. When reporting a lost time or fatal injury the following information must be provided.

Injured name, address, social security number, immediate supervisor, exact location of accident, nature of injuries if known, time of accident and accident details known at the time.

In the event of a fatality, the President / Safety Director will proceed to the job site as soon as possible to aid in the accident investigation. The accident investigation must start immediately by the Project Superintendent. The Project Superintendent, President / Safety Director if applicable shall develop the final accident or fatal injury investigation report. The findings of the injury or fatal accident investigation and recommendations made will be submitted to the President for review and follow-up. Lost time injuries that are very serious in nature and have potential to cause fatal injuries must be reported in the same manner and shall be investigated by the Safety Director and Project Manager. The report and recommendations generated from this investigation will be submitted in the same manner for review and follow-up. All other lost time injuries must be reported to the President / Safety Director as soon as it is determined that

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6. Lost Time or Fatal Injuries (cont.)

the injury will involve days away from work. The accident investigation form must be completed and the President / Safety Director and Project Superintendent will determine if further investigation is needed. Per 29 CFR 1904.8 (a), OSHA requires notification of a fatality or accident causing in-patient hospitalization of three or more employees within 8 hours of the accident. The initial notification shall be made either by telephone or in person to the OSHA Area Office nearest to the incident.

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U.S. Department of Labor

Bureau of Labor Statistics
Supplementary Record of
Occupational Injuries and Illnesses

This form is required by Public Law 91-506 and must be kept in the establishment for 5 years. Failure to maintain can result in the issuance of citations and assessment of penalties.

Case or File No.

Form
Approved
O.M.B. No. 1220
0029

Employer

- Name
- Mail address (*No. and street, city or town, State, and zip code*)
- Location, if different from mail address

Injured or Ill Employee

- Name (*First, middle, and last*)

Social Security No.

- Home Address (*No. and street, city or town, State, and zip code*)
- Age
- Sex: (*Check one*)
Male Female
- Occupation (*Enter regular job title, not the specific activity he was performing at time of injury.*)
- Department (*Enter name of department or division in which the injured person is regularly employed, even though he may have been temporarily working in another department at the time of injury.*)

The Accident or Exposure to Occupational Illness

If accident or exposure occurred on employer's premises, give address of plant or establishment in which it occurred.
Do not indicate department or division within the plant or establishment. If accident occurred outside employer's premises at an identifiable address, give that address. If it occurred on a public highway or at any other place which cannot be identified by number and street, please provide place references locating the place of injury as accurately as possible.

- Place of accident or exposure (*No. and street, city or town, State, and zip code*)
- Was place of accident or exposure on employer's premises?
Yes No
- What was the employee doing when injured? (*Be specific. If he was using tools or equipment or handling material name them and tell what he was doing with them.*)
- How did the accident occur? (*Describe fully the events which resulted in the injury or occupational illness. (Tell what happened. Name any objects or substances involved and tell how they were involved. Give full details on all factors which led or contributed to the accident. Use separate sheet for additional space.)*)

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Occupational Injury or Occupational Illness

14. Describe the injury or illness in detail and indicate the part of body affected. (E.g., *amputation of right index finger at second joint; fracture of ribs; lead poisoning; dermatitis of left hand, etc.*)

15. Name the object or substance which directly injured the employee. (For example, *the machine or thing he struck against or which struck him; the vapor or poison he inhaled or swallowed; the chemical or radiation which irritated his skin; or in cases of strains, hernias, etc., the thing he was lifting, pulling, etc.*)

16. Date of injury or initial diagnosis of occupational illness

17. Did employee die? (Check one)

Yes No

Other

18. Name and address of physician

19. If hospitalized, name and address of hospital

Date of Report

Prepared by

Official position

OSHA No. 101 (Feb. 1981)

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Section III - Safety Bulletins

- No. 1 Safety Training
- No. 2 Fire Prevention on Job Sites
- No. 3 Containers – Flammable Liquids
- No. 4 Storage, Use and Handling of Solvents and Other Flammables
- No. 5 OSHA Record-keeping Program
- No. 6 Assured Grounding Program
- No. 7 OSHA Inspection Procedures
- No. 8 Confined Space Entry
- No. 9 Lock Out / Tag Out / Try Out
- No. 10 Signs / Signals / Barricades
- No. 11 Fall Protection
- No. 12 Trenching and Shoring
- No. 13 Scaffolds and Ladders
- No. 14 Site-Specific Hazard Communications
- No. 15 Storm Water Pollution Prevention Program

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 1

SUBJECT: SAFETY TRAINING IN COMPANY SAFETY MANUAL

In accordance with existing instructions, all employees are to be instructed in the contents of the Safety Manual. The purpose of this program is to drill and instruct all employees in the contents of this Manual to the end that there will ultimately be no violations of established safety rules and regulations.

All employees will be informed of this program, and a method outlined by which it can be carried out. Each Superintendent should understand that the Manual will be covered at a series of meetings, first taking the sections that are particularly applicable to the work currently in progress. They should also understand that the Sub-contractor is responsible for training the members of their crew in the applicable contents of the Manual.

The Project Superintendents must set up the necessary controls to see that each sub-contractor discusses specific section of the Manual as it applies to their craft.

The President / Safety Director, after each of his visits to various jobs, will follow up to see that the program is operating as intended and will assist the Superintendent in conducting training sessions.

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SAFETY BULLETIN # 2

SUBJECT: FIRE PREVENTION ON JOBSITES

Fire hazards on project sites are a constant source of danger. This is largely due to lack of fire fighting facilities, the presence of combustible materials, and poor control over heat sources.

Serious fires endanger workers, damage material and equipment, delay the work, and may damage equipment or structure, which will require removal and reconstruction. Even the smallest accidental fire results in some loss, if only the time required putting it out, but seldom is the loss so minor.

In all fire prevention methods, the most important factor is to control the source. History indicates, the principle sources of fires are welding and burning operations, outside salamanders, stoves for heating change shanties and uncontrolled smoking.

Proper precautionary measures will keep fire losses to a minimum:

1. Good housekeeping tends to remove fire sources and provides easiest control when emergencies arise. Make a daily check of tool houses, change shanties, offices, etc., to eliminate any accumulation of rubbish, oily rags, combustible scrap, etc.
2. Install the proper type fire extinguisher in each shanty or office and make periodic checks to insure they are in good order. Remember that the extinguisher must be recharged after each use.
3. All stoves must have protection against fire. Stoves must have the flue protected at the ceiling and roofline with asbestos or tin, with an air space between flue and insulation.
4. Never attempt to start fires in stoves, salamanders, etc., with gasoline, kerosene, or any other flammable liquid and never pour such flammable liquid on a fire that is already burning.
5. Make a periodic check on the wiring and connections in all tool rooms, offices, etc.
6. Make certain that all fires are out before leaving the job at the end of each shift.
7. All clothing must be kept a minimum of three feet (3' 0") from the nearest edge of the stove.
8. Provide metal containers partially filled with sand or slag in each shanty for cigar or cigarette butts. Clean these out periodically as necessary.
9. Clothing that is soiled with oil, grease or paint should not be left in confined places but should be hung out in the open air.
10. Never store paint, oil, lubricants or other highly flammable materials in heated shanties. Keep such material in a separate shanty isolated somewhat from other buildings. Establish a definite procedure for handling flammable liquids.
11. Prohibit smoking in highly flammable areas. Provide limited smoking areas, if necessary.

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SAFETY BULLETIN # 2 (continued)

12. Instruct as many of the workers as possible, particularly key employees and watchmen, in the proper use of fire fighting equipment.
13. Establish regular inspections to detect fire hazards and take immediate corrective action upon detection of such hazards.
14. Establish a regular schedule for servicing and maintaining fire extinguishers. Relocate extinguishers as the job progresses. Remember that water extinguishers must be protected with anti-freeze solutions in winter weather.
15. Be certain that key personnel know the location of the nearest fire alarm and are familiar with the method of sounding such alarm.
16. See that salamanders are constructed with a stable base so as not to easily overturn. Provide protection against hot ashes, sparks, etc. See that fires are extinguished at the end of the shift or when the area is vacated.
17. Before starting any burning or welding, look around to make certain that flames, sparks, or hot metal will not be likely to start a fire. Remember that fires resulting from this type of work are often delayed in starting. Inspect the area thoroughly after the operation is completed.
18. A suitable fire extinguisher should always be ready for instant use where welding or burning is done. Where combustible materials are present near the operation, a helper or extra person, if necessary, should be on hand to guard against fires.
19. One fire extinguisher, in good operating condition, must be in place on each piece of heavy equipment.
20. Never attempt to fuel any equipment while it is in operation or the engine is running. Avoid spilling any fuel on a hot engine.
21. When working in highly flammable areas, it is necessary to contain the sparks from exhaust of engines.
22. Use only approved type containers for storage or transporting of gasoline, fuel oil, solvents, paint thinner, etc. Flame retarding safety cans (painted red) only are to be used for storing or transporting small quantities of gasoline and other inflammable liquids. These cans are electrically welded one-piece construction, air tested, and the spout is equipped with double-perforated flame arrestor. The cap is spring loaded for tight closure and provides automatic pressure relief.
23. Remember that the first few seconds are most important. A few seconds saved at the start of a fire may make the difference between something comparatively minor and a major loss.

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SAFETY BULLETIN # 3

SUBJECT: CONTAINERS - FLAMMABLE LIQUIDS

This safety bulletin concerns containers for the use, storing, and handling of flammable liquids such as alcohol, fuel oil, gasoline, kerosene, paint thinner, solvent, etc. It also contains information on containers, handling motor oil, lubricating oil, grease, etc.

1. When flammable liquids, including those listed above, are handled or stored in small containers such as five-gallon cans, such cans must be of an approved safety type, painted red in color, with yellow wording "Danger - Keep Away from Fires" and listing the contents of the can. To meet safety requirements, such cans must be of one-piece construction (electrically welded), air tested, and the spout equipped with double-perforated flame arrestor. The cap is to be spring-loaded for tight closure and provide automatic pressure relief.
2. Such products as motor oil, lubricating oil, and greases, which are less volatile and less flammable, may be handled in containers other than the safety type listed above. However, the contents must be labeled on the can or container. Such cans must also be labeled "Keep Away From Fires".
3. Where flammable liquids are stored or handled in larger quantities such as barrels, drums or tanks, such containers must be labeled to show their content.
4. Fuel tanks must be properly marked with labels or stencil showing contents capacity, owner of the tank's name, etc.
5. Fire extinguishers are required near refueling stations.

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SAFETY BULLETIN # 4

SUBJECT: STORAGE, USE AND HANDLING OF SOLVENTS AND OTHER FLAMMABLES

The selection of a safe solvent for maintenance cleaning operations presents a vexing and difficult problem due to the inherent health and fire hazard potentials of solvents, the many trade names under which they are marketed, the constant changing of the formulation of the product, and the advertising statements of the manufacturers. This is particularly so in construction because our operations are widely scattered and such products are commonly purchased at the local level.

Generally speaking, all organic solvents may be toxic and may affect the skin, and most are flammable or explosive. Therefore, considerable caution must be exercised when using any such solvent regardless of any claims made by Salesmen or Manufacturers. In selecting a solvent, the prime consideration should be to use the least hazardous solvent which will meet the cleaning requirements and to apply adequate safeguards.

Note that many solvents have a flash point of around 100 degrees Fahrenheit, which is a good index of the fire potential. Flash point is the temperature to which a solvent must be heated to evolve enough vapor to give a momentary flash of fire when a source of ignition is applied to the vapor.

No solvent with a flash point under 100 degrees Fahrenheit should be used in general maintenance cleaning, and all solvents must be kept away from fires or other sources of ignition.

As mentioned above, all organic solvents are toxic to some degree and have a high dermatitis potential. Therefore, controls and safety precautions must be set up to keep these health hazards to a minimum and all workers using such solvents must be instructed accordingly.

The following pages include a list of safety precautions concerning the use of cleaning solvents, gasoline, kerosene, paint and other flammable liquids.

Generally speaking, all organic solvents are toxic, have a high dermatitis potential, and most are flammable or explosive. Therefore, controls and safety precautions must be established to keep these health and fire hazards to a minimum and all workers using such solvents must be instructed accordingly.

1. Do not use solvents with a flash point under 100 degrees Fahrenheit, and keep all solvents away from fires or other sources of ignition since they will burn readily if ignited. Never use solvents or any other flammable liquids to start or kindle a fire.
2. Do not use solvents of coal tar derivatives such as benzol, toluol, etc., or chlorinated solvents such as carbon tetrachloride because of high toxicity factors.
3. Insist that workers properly use solvents so as to maintain as low a solvent consumption and exposure as the job will allow. Use in large and well-ventilated areas, if possible, to achieve minimum dilution of the vapors. In confined areas, mechanical exhaust or ventilation must be provided.

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SAFETY BULLETIN # 4 (continued)

4. If solvents or other flammable liquids such as gasoline, kerosene, paints, etc., are to be stored in quantities such as 55 gallon drums or tanks, a flammable storage area must be established and clearly defined with a barricade, fence, etc. The required "No Smoking" and "Danger - Keep Fires Away" signs must be posted around the area. Some plants require dikes around refueling stations and waste oil storage tanks.
5. If a field shanty is used for storage of flammables such as kerosene, grease, oils, solvents, paints, etc., it must be isolated from other shanties or buildings and designated as a flammable storage area with the required signs as noted above. No stoves or fires are permitted in such areas, and they are not to be used as change shanties for the workers. Also, ventilation must be provided.
6. Workers are not permitted to smoke while using solvents or any other flammable liquids, and smoking is prohibited in all areas where explosive concentrations of flammable vapors may be present.
7. When solvents or other flammable liquids are handled or used in small containers such as five-gallon cans, such cans must be of an approved "safety type", painted red in color, with the wording "Danger - Keep Away From Fires" and list the contents of the can. To meet safety requirements, such cans must be of one-piece construction (electrically welded), air tested, and the spout equipped with a double-perforated flame arrestor. The cap is to be spring loaded for tight closure and provide automatic pressure relief.
8. Workers must be educated in the need for thoroughly washing the hands and forearms after using solvents so as to reduce the duration of contact with the skin. Plenty of soap and water is best for this.
9. Keep the lids on containers so as to minimize evaporation, thereby reducing the health and fire hazards.
10. Empty solvent containers should be considered as fire and explosion hazards, even several months after use, unless they are treated so to be free of solvent.
11. Do not use compressed air to force flammable liquids out of containers: Use spigots or approved type pumps.
12. Provide a sufficient supply of suitable fire extinguishers where flammable liquids are used or stored. Do not allow rubbish, brush, long grass, or other combustible materials to accumulate in areas where flammable liquids are stored, handled, or used.
13. Workers must be required to guard against their clothing becoming contaminated with solvent or other flammable liquids. They must not be permitted to work when clothing becomes so contaminated.
14. The same fire precautions for storing of paints shall be applied, as listed in Rules 4 and 5 of these precautions.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 5

SUBJECT: OSHA RECORDKEEPING REQUIREMENTS

Every job site that is considered a fixed place of employment must meet the OSHA record-keeping requirements by maintaining an OSHA No. 300 log of occupational injuries and illness which includes the annual summary. A master OSHA No. 300 log will be kept at the Corporate Office for all recordable injuries and illnesses for the entire Company. Each job site where a trailer is set up must maintain these records. Also during a project, duplicate logs and records will be kept at the Corporate office for bill payment and workman's compensation purposes. Once the project is completed the OSHA No. 300 log and all injury files are to be sent to the President / Safety Director at the Corporate Office for filing. OSHA also requires that an Accident/ Incident reports Form (Supplementary Record of Occupational Injuries and Illnesses) also be maintained. Our worker's compensation first report of injury forms meet this requirement. Every recordable injury requires one of these forms even if its not a workman's compensation claim. All information must be filled in.

It is imperative that these forms be completed promptly, accurately and that recordable injuries and illnesses are posted on the OSHA No. 300 log. Also, when a recordable injury or illness is recorded, the information must be sent to the President / Safety Director by Fax or Phone. This is to keep records in the corporate office up to date.

What follows is the actual procedure for completing the OSHA No. 300 and a record-keeping summary that explains how to determine if an injury is recordable or not. All final determinations will be the responsibility of the President / Safety Director.

Remember: Only recordable injuries are to be posted on the OSHA No. 300.

Only two forms are used for OSHA record-keeping. One form, the OSHA No. 300, serves two purposes: (1) As the Log of Occupational Injuries and Illnesses on which the occurrence, extent, and outcome of cases are recorded during the year; and (2) as the Summary of Occupational Injuries and Illnesses which are used to summarize the log at the end of the year to satisfy employer posting obligations. The other form, the Supplementary Record of Occupational Injuries and Illnesses, Accident/Incident reports, provides additional information on each of the cases that have been recorded on the log. The first reports of injury or illness forms we file with our worker's compensation insurance carrier or state funds meet the requirements for Accident/Incident reports.

An OSHA 300 log must be maintained on all projects with an established office for the duration of the project. At the end of the project or at the end of the year, the log is to be sent to the President / Safety Director for filing. When the posting is required, the appropriate part of the log will be sent to the job site with the posting instructions.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN #5 (continued)

A. The Log of Occupational Injuries and Illnesses, OSHA No. 300

The log is used for recording and classifying recordable occupational injuries and illnesses, and for noting the extent and outcome of each case. The log shows when the occupational injury or illness occurred, to whom, what the injured or ill person's regular job was at the time of the injury or illness exposure, the department in which the person was employed, the kind of injury or illness, how much time was lost, and whether the case results in a fatality, etc.

The log consists of three parts: A descriptive section which identifies the employee and briefly describes the injury or illness; a section covering the extent of the injuries recorded; and a section on the type and extent of illness.

While most of the columns seem self-explanatory, there are some important requirements to be considered when completing the log. The following information pertains to the descriptive section of the log.

- Column A. Enter a number that is unique for each case. This is very important because each case must be identified and examined separately. The simplest method of numbering may be the best; i.e., 1, 2, 3. Employers may also number cases by month; for example, 7-15 would indicate the 15th case occurring during July.
- Column B. For occupational injuries, enter the date of the work accident, which resulted in injury. For occupational illnesses, enter date of initial diagnosis of illness, or, if absence from work occurred before diagnosis, enter the first day of absence attributable to the illness, which was later diagnosed or detected. Cases do not necessarily fall consecutively by date, because injuries and illnesses are recorded as an employer learns that a case has occurred.
- Column C. Insert 1 of 2 entries: (1) First name, middle initial, and last name; or (2) first initial, middle initial, and last name.
- Column D. Specify the injured or ill employee's regular job title even if the employee was working outside his or her regularly assigned occupation at the time of the injury or illness exposure.
- Column E. State the department in which the injured or ill person is regularly employed. Enter the department in which the injury or illness exposure occurred only if it is the regularly assigned station. If an employee is regularly assigned in the maintenance department, but was injured while working in the shipping department, the correct entry would be "maintenance".

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 5 (continued)

Column F. Briefly describe the nature of the injury or illness and part(s) of the body affected. For example, amputation-finger, is not sufficiently detailed. A correct entry would be amputation-second joint, forefinger, left hand. This tells which hand, which finger, and to what degree. The examples listed in the heading for column F on the log form are good indications of how entries should be made.

The injury portion of the log is reproduced to the right. The following instruction concern entries made in this section.

Column 1. The date of death must be entered if an occupational injury results in a fatality. In some cases, an employee may be injured, but not die until several weeks or months later. If the death occurs within 5 years following the end of the calendar year in which the injury occurred, and the injury was work related, the entry on the log must be changed to reflect a fatality; the entries in columns 2 through 6 must be lined out, and the date of death entered in column 1.

Column 2. If a case involves lost workdays due to an injury, check this column. Lost workdays include both days away from work and days of restricted work activity, or both. The number of lost workdays should not include the day of injury or any days on which the employee would not have worked even though able to work (i.e., weekends, paid holidays, vacations, etc.).

Column 3. Check if the injury involves days away from work.

Column 4. Enter the actual number of days away from work.

Column 5. Enter the actual number of days of restricted work activity.

Column 6. If no entry was made in columns 1 or 2, but the injury is recordable according to the guidelines in this report or the instructions on the OSHA No. 300 log, a check must be entered to indicate that it was an injury without lost workdays.

The illness portion of the log follows on the next page with instructions relating to the columns in this section.

Column 7. For occupational illnesses, an entry should be placed in one of the columns 7a through 7g, depending upon which column is applicable. It is important to keep in mind that illnesses must be evaluated individually. For example, a sunstroke would require a check in column 7e; eczema or rash would require a check in column 7a, etc. The reverse side of the log form gives examples of cases under each illness category.

Column 8. The date of death must be entered if an occupational illness results in fatality within 5 years following the year the illness was initially entered on the log.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 5 (continued)

- Column 9. Check if the illness involves days away from work or days of restricted work activity, or both.
- Column 10. Enter a check if the illness involves days away from work.
- Column 11. Enter the actual number of days away from work resulting from the illness.
- Column 12. Enter the number of days of restricted work activity resulting from the illness.
- Column 13. Enter a check if no entry was made in columns 8 or 9 since the illness did not involve lost workdays.

For illnesses only, when a termination or permanent transfer is involved, place an asterisk (*) to the right of the entry in columns 7a through 7g (type of illness).

The log must be maintained on a calendar year (not fiscal) basis. Logs must be kept current and retained for 5 years following the end of the calendar year to which they relate. If there is a change in the extent or outcome of a case entered on the log, the first entry should be lined out and a corrected entry made. An entry may be lined out if a case is later found to be non-recordable. Entries should be made for previously unrecorded cases that are discovered or found to be recordable after the end of the year in which the case occurred. The new entry should be made on the log for the year in which the case occurred.

An employer must make an entry on the log no later than 6 working days after receiving information that a recordable case has occurred.

B. The Summary of Occupational Injuries and Illnesses, OSHA No. 300

The portion of the OSHA No. 300 to the right of the dotted vertical line is used to summarize injuries and illnesses in an establishment for the previous calendar year. Every non-exempt employer who is required to keep OSHA records must prepare an annual summary for each establishment, based on the information contained in the log for each establishment. The summary is prepared by totaling the column entries on the log (or its equivalent) and signing and dating the certification portion of the form at the bottom of the page.

Part 1904.5 of the Code of Federal Regulations states the requirements for the annual summary of occupational injuries and illnesses:

1. Each employer shall post an annual summary of occupational injuries and illnesses for each establishment. This summary shall consist of a copy of the year's totals from the form OSHA No. 300 and the following information from that form: calendar year covered, company name, establishment address, certification signature, title, and date. . . If no injuries or illnesses occurred in the year, zeros must be entered on the totals line, and the form must be posted.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 5 (continued)

2. The summary shall be completed by February 1, for the preceding year.
3. Each employer, or the officer or employee of the employer who supervises the preparation of the log and summary of occupational injuries and illnesses, shall certify that the annual summary of occupational injuries and illnesses is true and complete.
4. Each employer shall post a copy of the establishment's summary in each establishment in the same manner that notices are required to be posted under Section 1903.2 (a) (1) of this chapter. The summary covering the previous calendar year shall be posted no later than February 1, and shall remain in place until March 1.
- 4a. Failure to post a copy of the establishment's annual summary may result in the issuance of citations and assessment of penalties pursuant to Sections 9 and 17 of the Act.

Before preparing the summary which is shown on the next page, the employer should review the log to be sure the entries are correct and current. Each case should be checked to make sure that it is only one of the "extent" categories on the log (fatalities, lost workday cases, nonfatal cases without lost workdays). Any open case involving a loss of workdays which is continuing at the time of the summary is prepared should be complete by estimating the number of future workdays the employee will lose. The estimated number of future lost workdays should be added to the number of workdays already lost, and the combined total entered on the log and included in the summary. (The log should be revised at a later date to reflect the number of days that were actually lost).

The yearly totals on the log are all that is needed for posting. Employers may prepare the summary in 1 of 2 ways: (1) they can use the last page of the log they have been maintaining during the year by folding the log so that the portion to the left of the dotted line is turned under to conceal the names of the injured or ill employees; or (2) they can use a photocopy or separate form, such as a blank OSHA No. 300.

Completing the summary is a relatively simple procedure. The right hand portion of the log (to the right of the dotted fold line) is used for this purpose. Employers complete the top portion of the page by entering the year to which the records relate, the company name (and the establishment name, if different from the company), and the address. Then the entries in columns 1 through 13 are added vertically and totaled on the bottom line. Note that, although all the column entries for cases and lost workdays must be totaled, employers need not total the asterisks on the log signifying illnesses resulting in termination of employment or permanent transfer, since these are primarily for the information of authorized Federal or State officials. The summary is completed with the signature of the person responsible for the summary information and the date of that person's signature at the bottom of the page.

Basic record-keeping concepts and guidelines are included with instructions on the back of form OSHA No. 300. The following summarizes the major record-keeping concepts and provides additional information to aid in keeping records accurately.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 5 (continued)

General Concepts of recordability

1. An injury or illness is considered work related if it results from an event of exposure in the work environment. The work environment is primarily composed of: (1) The employer's premises, and (2) other locations where employees are engaged in work-related activities or are present as a condition of their employment. When an employee is off the employer's premises, work relationship must be established; when on the premises, this relationship is presumed. The employer's premises encompass the total establishment. This includes not only the primary facility, but also such areas as company storage facilities, cafeterias, and rest rooms. In addition to physical locations, equipment or materials used in the course of an employee's work are also considered part of the employee's work environment.
2. All work-related fatalities are recordable.
3. All recognized or diagnosed work-related illnesses are recordable.
4. All work-related injuries requiring medical treatment or involving loss of consciousness, restriction of work or motion, or transfer to another job are recordable.

Analysis of Injuries

Recordable and non-recordable injuries. Each case is distinguished by the treatment provided; i.e., if the injury was such that medical treatment was provided or should have been provided, it is recordable; if only first aid was required, it is not recordable. However, medical treatment is only one of several criteria for determining recordability. Regardless of treatment, if the injury involved loss of consciousness, restriction of work or motion, or transfer to another job, the injury is recordable.

Medical treatment. The following procedures are generally considered medical treatment. Injuries for which this type of treatment was provided or should have been provided are almost always recordable if the injury is work related:

- Treatment of INFECTION
- Application of ANTISEPTICS during second or subsequent visit to medical personnel.
- Treatment of SECOND OR THIRD DEGREE BURN(S)
- Application of SUTURES (stitches)
- Application of BUTTERFLY ADHESIVE DRESSING(S) or STERI STRIP(S) in lieu of sutures.
- Removal of FOREIGN BODIES EMBEDDED IN EYE
- Removal of FOREIGN BODIES FROM WOUND; if procedure is COMPLICATED because of depth of embedment, size, or location.
- Use of PRESCRIPTION MEDICATIONS (except a single dose administered on first visit for minor injury or discomfort)

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 5 (continued)

- Use of hot or cold SOAKING THERAPY during second or subsequent visit to medical personnel
- CUTTING AWAY DEAD SKIN (surgical debriment)
- Application of HEAT THERAPY during second or subsequent visit to medical personnel
- Use of WHIRLPOOL BATH THERAPY during second or subsequent visit to medical personnel
- POSITIVE X-RAY DIAGNOSIS (fractures, broken bones, etc.)
- ADMISSION TO A HOSPITAL or equivalent medical facility FOR TREATMENT.

First aid treatment. The following procedures are generally considered first aid treatment (i.e., one-time treatment and subsequent observation of minor injuries) and should not be recorded if the work-related injury does not involve loss of consciousness, restriction of work or motion, or transfer to another job:

- Application of ANTISEPTICS during first visit to medical personnel.
- Treatment of FIRST DEGREE BURN(S)
- Application of BANDAGE(S) during any visit to medical personnel.
- Use of ELASTIC BANDAGE(S) during first visit to medical personnel.
- Removal of FOREIGN BODIES NOT EMBEDDED IN EYE if only irrigation is required.
- Removal of FOREIGN BODIES FROM WOUND; if procedure is UNCOMPLICATED, and is, for example, by tweezers or other simple technique.
- Use of NON-PRESCRIPTION MEDICATION AND administration of single dose of PRESCRIPTION MEDICATION on first visit for minor injury or discomfort.
- SOAKING THERAPY on initial visit to medical personnel or removal of bandages by SOAKING
- Application of hot or cold COMPRESS(ES) during first visit to medical personnel.
- Application of OINTMENTS to abrasions to prevent drying or cracking.
- Application of HEAT THERAPY during first visit to medical personnel.
- Use of WHIRLPOOL BATH THERAPY during first visit to medical personnel.
- NEGATIVE X-RAY DIAGNOSIS.
- OBSERVATION of injury during visit to medical personnel.

The following procedure, by itself, is not considered medical treatment:

- Administration of TETANUS SHOT(S) or BOOSTER(S). However, these shots are often given in conjunction with more serious injuries; consequently, injuries requiring these shots may be recordable for other reasons.

REMINDER: Work-related injuries requiring only first aid treatment and that do not involve any of the conditions in item 4 above, are not recordable.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 5 (continued)

C. Company Injury File

Each injury will be put on the injury log. A supervisors 1st report of injury will be filled out by the Project Superintendent. These forms are to be filled out completely! If the employee requires or requests medical treatment by a doctor (must be seen by the company doctor) a copy of their W-4 forms is to be put in the injury file along with all medical information and notes regarding the case. All medical records received are to be faxed with the supervisors first report of injury to the Corporate Office, then kept in the injury file. A separate file is to be kept on each injury reported. If at a later date an injury is discovered to be recordable, fax a memo or phone the President / Safety Director with the information and documentation.

D. NOTE:

1. If unsure on an injury being recordable, log it on the OSHA 300 Log as a recordable and contact the President / Safety Director for a determination.
2. Never use white out to make a correction on the OSHA log 200. Draw a line thru the mistake and write in the correct information above it.
3. Never use a pencil on OSHA 300 or Accident/ Incident reports.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 6

SUBJECT: EQUIPMENT GROUNDING CONDUCTOR PROGRAM

It is required by OSHA Standard 1926.400(h) that an Assured Equipment Grounding Conductor Program be established and implemented on all construction sites not equipped with ground-fault circuit interrupters. The program shall cover all cord sets, receptacles which are not a part of the permanent wiring of the building or structure, and equipment connected by cord and plug which is available for use by employees.

All sub-contractors are designated to implement the assured equipment grounding conductor program for cord sets and receptacles that they bring to a job site. OSHA Standard 1926.32(f) defines competent as one who is capable of identifying existing and predictable hazards in the surrounding or working conditions which are unsanitary, hazardous or dangerous to employees and who is authorized to take prompt corrective measures to eliminate them.

The persons designated will be responsible for tests on all cord sets, receptacles which are not part of the permanent wiring of the building or structure, and cord and plug equipment required to be grounded. Tests shall be documented on the Log (copy at the end of this section) for the Assured Equipment Grounding Conductor Program shall be kept on hand for OSHA officials and any affected employees. Equipment that does not meet prescribed tests shall not be put out of service until the following tests are performed:

1. All equipment grounding conductors shall be tested for continuity and shall be electrically continuous.
2. Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductor. The equipment grounding conductor shall be connected to its proper terminal. All required tests shall be performed:
 - a. Before first use;
 - b. Before equipment is returned to service following any repair;
 - c. Before equipment is used after any incident which can be reasonably suspected to have caused damage.
 - d. At intervals not to exceed three months, except that cord sets and receptacles which are fixed and not exposed to damage should be tested at intervals not to exceed six months.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 7

SUBJECT: OSHA INSPECTION PROCEDURE

In accordance with the Occupational Safety and Health Act of 1970 (OSHA), or its state equivalent, authorized OSHA officers will be permitted to inspect our job sites and facilities at reasonable times and within reasonable limits. In all cases, the Project Superintendent will accompany the OSHA inspector (compliance officers) and cooperate with them fully in accordance with this procedure.

In the event of an OSHA Inspection, the Project Superintendent MUST contact the Company President / Safety Director to inform of the investigation.

This procedure will apply to federal OSHA inspections and to state inspections with OSHA approved state programs.

Types of Inspections

The types of inspections in decreasing priority are listed below:

1. Catastrophe or Fatality Investigations: These are triggered by accidents where five or more people are injured or a fatality which must be reported to the local OSHA office.
2. Employee Complaint Investigations: These take priority based on the seriousness of the alleged condition. This is the most common type of inspection.
3. Target Industry Program Investigations: These are conducted in selected industries determined by OSHA to have above-average rates of injury.
4. General Administration Investigations: These are conducted by the local OSHA office as time and manpower permit based on reported accident frequencies of various industries. This type of inspection is the least common.

Pre-inspection Conference

An opening conference with the Compliance Officer will be held. At this opening conference, the Project Superintendent will take the following steps:

1. Ask to see the Compliance Officer's credentials. The principal credential will be a U.S. Department of Labor (or state equivalent) I.D. card generally bearing the Compliance Officer's photograph and serial number.
2. Begin to fill out a report.
3. Determine the reason for the Compliance Officer's visit (general inspection, employee complaint, accident or fatality inspection, etc.). Obtain copies of any complaint or search warrant.

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4. Ask the areas of the job site the Compliance Officer wishes to see and how he intends to conduct his investigation.
5. Inform the Compliance Officer of any limits that may be imposed (owner limitations or other special conditions).

Scope of Inspection

In the case of employee complaints, the inspection should be restricted to the scope of the complaint. The complaint itself should specify in reasonable detail the nature of the alleged violations. An inspection resulting from a fatality or major accident report should also be restricted to the relative cause of the accident.

A general administration inspection usually means the entire job site will be inspected.

Regardless of any prearranged limitation on the scope of an inspection, the inspector may cite any conditions he observes during the course of his inspection whether or not it is related to the purpose of the inspection. This is called "Plain Cite". In other words, the inspector can cite any violation he sees on the way to or back from the specific area he will be inspecting. This means care must be taken when choosing the route to the area that is to be inspected.

Employee Participation in Inspections

Employee representatives may be given the opportunity to accompany the Compliance Officer during his inspection. Anyone accompanying the Compliance Officer will be paid his/her regular wage for time spent with Compliance Officer.

The Actual Inspection

The Project Superintendent will take the following steps:

1. Make sure all participants have and use the necessary personal protective equipment.
2. Make detailed notes of the inspection as it progresses.
3. Make sure that the inspection does not unreasonably interfere with the work in progress.
4. If possible, correct immediately any violation pointed out by the Compliance Officer.
5. Try to record the name of everyone the Compliance Officer speaks to, but not in a manner that seems intimidating to the employee.
6. The Compliance Officer is permitted to take photographs. Wherever a Compliance Officer photographs a condition, the Project Superintendent would also take a photograph of the same condition. The photograph should be taken at the best angle possible so there are no misleading impressions.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 7 (continued)

Should the Compliance Officer request a private interview with an employee or employees, this request must be honored.

Post Inspection Conference

After the inspection, a meeting should be held with the Compliance Officer.

At this meeting, the Project Superintendent should do the following:

1. Decide whether or not the employee representatives should attend, depending on the nature of the meeting.
2. Furnish information the Compliance Officer may not have; and, if requested, provide him with OSHA Log and Summary (Form 300) and OSHA Supplementary Record (First Report of Injury). **No other company records are to be given to the Compliance Officer without first clearing it with the Company Safety Coordinator.**
3. Ask the Compliance Officer whether any violations were found and request that copies of any formal citations to be issued be provided as soon as possible.
4. Be courteous but cautious in conversations with the Compliance Officer. He may try to obtain information or admissions which may show up later to support citations. Do not admit the existence of violations and avoid conversations about abatement dates. Do not volunteer information.

Reports of Inspections

1. As soon as possible after the inspection, the President / Safety Director should be notified by telephone and given as much information as possible.
2. The report, photographs and notes is to be mailed to the President / Safety Director as soon as possible. It is imperative that all pertinent information concerning the inspection be included.
3. Set up a complete file on the inspection. Include all documents supplied by the Compliance Officer, photographs, notes, etc.

Procedure Following Inspection

The following is a brief summary of the course of the citation and the appeal process following the inspection. The President / Safety Director and legal advisors will work together to determine what action will be taken after issuance of a citation. (If no violations are found during the inspection, a citation will not be issued).

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 7 (continued)

1. Issuance of Formal Citation

Within a reasonable time, OSHA is required to issue a formal citation listing all the violations of the OSHA Act alleged to have occurred. The citations will include:

- a. The specific standard or standards alleged to have been violated.
- b. A proposed penalty amount for each violation.
- c. Violation abatement dates.

Included with the citation will be information on payment of any fines and how the citation may be appealed. A copy of the citation must be posted at or near each location where an alleged violation is claimed to have occurred. The citation must remain posted for at least three working days or until the violation is abated, whichever is longer. It may be necessary to post any additional notices as those stating the citation is being contested and/or steps being taken to abate the alleged violations. Copies of citations or other notices must be sent immediately to the President / Safety Director

2. Abatement of Cited Violations

OSHA citations (Notices of Violations) generally include a specific time period within which the violations must be "abated" or corrected. OSHA usually requires employers to confirm that abatement steps have been taken (this is done by writing a letter to the local OSHA office). An employer may file for a modification to the abatement date when he has made a good faith effort to comply, but abatement has not been completed because of circumstances beyond his control. Separate, additional penalties may be assessed by OSHA for failure to meet abatement deadlines.

3. Re-inspection

Under federal and most state procedures, if serious, willful or repeated violations are discovered, the Compliance Officer is required to conduct a follow-up inspection within two to seven working days after the abatement date. In the case of non-serious, the Compliance Officer may also conduct follow-up inspections, depending on the circumstance. Job site supervision will handle the re-inspection in the same manner as the initial inspection.

4. Appealing OSHA Citations

There are both formal and informal procedures available to contest OSHA citations. Generally, there are three involved in appeals:

- a. The applicability of the standard cited and/or the level of seriousness of the designated violation.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 7 (continued)

- b. The amount of the proposed penalty.
- c. The abatement period provided for the alleged violation.

After the citation (Notice of Violation) is received, the employer has fifteen (15) working days to file a formal Notice of Contest with OSHA. The case is then assigned to an Administrative Law Judge from the Occupational Safety and Health Review Commission (OSHRC), which is a separate federal agency. After this, a hearing is held in the community where the job site is located at which both employer and employee representatives are entitled to participate. The Administrative Law Judge then writes a decision which may be appealed to the full OSHRC in Washington, D.C. and ultimately to the federal courts.

Within the initial fifteen (15) day contest period, it is also possible to meet with OSHA regional and area office personnel to discuss citations and to try to resolve disputes informally.

However, citations and proposed penalties become final and un-appealable if a formal Notice of Contest is not filed within the required fifteen (15) day limit. This means that the timing of any informal meeting is important. The informal meeting should be scheduled as soon as possible.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 8

SUBJECT: CONFINED SPACE ENTRY

OSHA defines a confined space in 29 CFR 1910.146 Safety and Health Standards as follows:

Confined or enclosed space means any space having a limited means of egress, which is subject to the accumulation of toxic or flammable contaminants or has an oxygen deficient atmosphere. Confined or enclosed spaces include, but are not limited to, storage tanks, process vessels, bins, boilers, ventilation or exhaust ducts, sewers, underground utility vaults, tunnels, pipelines and open spaces more than 4 feet in depth such as pits, tubs, vaults, and vessels. Confined spaces are not intended for continuous employee occupancy.

HAZARDS ASSOCIATED WITH CONFINED SPACE ENTRY

A. Atmospheric Hazards

1. Asphyxiation (Lack of Oxygen) Less than 19.5% (Normal air has 20.9%).
 - a. Oxygen Enrichment (Excessive Oxygen) More than 23.5%. This hazard creates an explosive situation.
2. Toxic Atmospheres - Carbon Monoxide and Hydrogen Sulfide are the most common. There can be others. One must know what hazards to expect.
3. Flammable or Explosive Atmospheres - Gases, vapors, dusts in excess of 10% of LEL.

B. Engulfment - trapped or enveloped usually by dry bulk materials.

C. Mechanical Hazards - Failure to isolate equipment in confined spaces from sources of mechanical or electrical energy.

D. Untrained Rescuers - Sixty percent (60%) of all fatalities involve individuals trying to rescue someone that has gone down in a confined space/hazardous area.

Prior to entry into a confined space or hazardous area, specific procedures must be followed and specific precautions must be taken to insure the work is completed in a safe manner.

Many of the facilities we work in have confined space requirements which Stockdale Building Group, LLC personnel must comply. Some areas in which we work do not have confined space entry requirements. In these instances, SBG safety procedure must be followed. In either case, a properly completed confined space entry permit is required prior to anyone entering into a confined space. THERE ARE NO EXCEPTIONS to this permit requirement. In addition to this permit requirement, a safety stand-by person is required for all confined space work.

Working in a confined space requires planning, training of employees, and atmospheric testing.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 8 (continued)

I. PLANNING

- A. Review work to be performed.
- B. Identify all hazards that may be encountered.
 - 1. Atmospheric - Carbon Monoxide, Oxygen Deficiency/Enrichment, Combustible/Explosive Dust, etc.
 - 2. Fire Hazards -
 - a. Burning and Welding Permit required.
 - 3. Electrical or Mechanical Hazards
 - a. Must lock-out/try-out prior to entry.
 - 4. Purging, venting or flushing required.
 - 5. Lines/Pipes blanked
 - a. Lines that can create a hazard must be physically blanked. Do not put faith in valves alone.
- C. Continuous communications between entry personnel and safety stand-by is required.
- D. Emergency plans must be developed.
- E. Rescue plans must be developed.
- F. Develop a list of personal protective and rescue equipment that will be needed.
- G. Determine responsibilities for all phases of confined space work.

II. ATMOSPHERIC MONITORING (Gas Testing)

- A. All confined spaces require continuous monitoring.
- B. Minimum Requirements:
 - 1. Lower Explosive Limit (LEL) - Safe Level is less than 10%.
 - 2. Oxygen - Safe level 19.5% to 23.5%
 - 3. Carbon Monoxide - Safe Level is less than 35 PPM. A level of 200 PPM is considered immediately dangerous to life and health. Evacuate at 200 PPM, no exceptions. 35 to 200 PPM, must take fresh air breaks every two hours.

CORPORATE SAFETY MANUAL

4. Additional atmospheric testing may be required for toxins if there is potential for exposure.
- C. Gas monitors must be calibrated monthly.
- D. Readings must be taken every two hours and recorded on entry permit.
- E. Employees must be trained in proper use, limitations and calibration of gas testing instruments.
- F. Ventilation Requirements
- G. Initial Monitoring **MUST** be performed from **OUTSIDE** the confined space.

III. TRAINING

Prior to confined space entry, all supervision and employees involved must be properly trained. These training sessions shall be documented with those attending, date and time.

This training session shall include as a minimum, the following:

- A. Potential hazards and safety procedures to control these hazards.
 1. Air Contaminates
 - a. Oxygen Deficiency/Enrichment
 - b. Explosive Atmosphere (LEL)
 - c. Toxic Materials - Carbon Monoxide and/or others
 - d. Mechanical or Electrical Hazards
 - e. Fire and Explosion
- B. Entry Permit
 1. No one is to enter a confined space without a properly completed permit.
 2. Only authorized personnel are permitted into confined space.
 3. Safety stand-by person required for ALL confined space work.
 4. Entry permit shall be posted at the entrance of the confined space and remain until work is completed.
- C. Safety Stand-By (Attendant)
 1. Must maintain continuous contact with personnel in confined space.
 2. Ensure that only authorized personnel enter confined space.
 3. Order employees to evacuate confined space when conditions warrant:
 - a. When safety stand-by is to leave work station.
 - b. Observes a condition which is not allowed in the entry permit.
 - c. Detects behavior effects of hazard exposure.
 - d. Detects a condition outside which could endanger those in confined spaces.
 - e. Ventilation system failure.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 8 (continued)

4. Proper procedures for summoning rescue and other emergency services. Stand-by person is to have a radio to reach Safety Supervisor and Base Station.
 5. Proper use of rescue and emergency equipment.
- D. Emergency and Rescue Procedures
1. Emergency Egress
 2. Procedure to contact rescue/emergency services
 3. Fire procedures
 4. Proper use of emergency and rescue equipment
 - a. Fire extinguisher, fire hose
 - b. Self contained breathing apparatus
 - c. Protective clothing
 - d. Retrieval equipment
 1. Life Lines
 2. Full body harnesses
 3. Winches
 - e. Training in use of other required equipment
- E. Proper Use and Limitations of Personal Protective Equipment
1. Respiratory Protection - Refer to Safety Bulletin # 6
 2. Protective Clothing When Required
 3. Any Personal Protective Equipment Necessary
- F. Proper Use and Limitations of Air Monitoring Equipment
1. Calibration
 2. Alarm settings
 3. How to use monitor
- G. All of the above training must be completed prior to completion of entry permit and entry of confined spaces.

SBG's confined space entry permit is attached. It must be thoroughly completed and posted prior to any confined space entry. Each permit is good for 8 hours (1 Shift).

Completed Confined Space Permits are to be turned in to the Project Superintendent at the end of each shift. The permits are to be kept on file for the duration of the project. Some companies require copies of completed confined space permits to be turned in to their Safety Supervisor. At the end of the project, all confined space permits are to be sent to the President / Safety Director.

Project Superintendent is responsible to ensure that the proper procedures and precautions are taken prior to confined space entry. The Site Safety Supervisor is to be notified of any confined space entry prior to atmospheric monitoring.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 9

SUBJECT: LOCK-OUT / TAG-OUT / TRY-OUT POLICY

Before servicing or maintenance is performed on machinery or equipment, the machinery or equipment must be turned off and disconnected from the energy source by the use of an isolating device which must be either locked and tagged or in some cases just tagged.

Following is Stockdale Building Group Lock-Out/Tag-Out/Try-Out policy:

1. Energy isolation and Lock-Out/Tag-Out are to be applied only by trained employees authorized to perform service or maintenance.
2. Before Lock-Out/Tag-Out is applied, all employees working in the affected area must be notified.
3. The OSHA regulations require that control of hazardous energy be done in a six-step procedure:

A. Preparation for Shut-Down

Before turning off any equipment to Lock-Out or Tag-Out, a person must know:

1. Type and amount of energy of equipment
2. Hazards of that energy
3. How to control the energy

B. Equipment Shut-Down

1. Shut down the system by using its operating controls
2. Follow the proper energy control procedure for that piece of equipment to prevent endangering anyone during shutdown.

C. Equipment Isolation

1. Operate all energy isolating devices so that the equipment is isolated from its energy source
2. Be sure to isolate all energy sources and secondary power as well as main power sources.
3. Never pull an electrical switch while it is under a load
4. Never remove a fuse instead of disconnecting

D. Alloy Lock-Out Device or Tag

1. All energy sources are to be locked and tagged. In some cases just a tag is required.
2. Be sure all Lock-Out/Tag-Out devices are labeled with Company Name, Supervisor, Date, Phone Number

E. Release of Stored or Residual Energy (Try-Out)

1. Check each Lock-Out/Tag-Out device to make sure that they are performing properly.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 9 (continued)

2. If a line must be blocked where there is no valve, use a blank flange.
3. Purge tanks and process lines.
4. Dissipate extreme cold and heat, or wear protective clothing.
5. If stored energy can re-accumulate, monitor it to ensure that it stays below hazardous levels.

F. Verify Isolation of Equipment

1. Make sure all personnel are clear of danger areas.
2. Make sure that the main disconnect switch or circuit breaker cannot be moved to the ON position.
3. Press all start buttons and other activating controls on the equipment itself.
4. Shut off all machine controls when the testing is finished.

The above steps will require cooperation between electricians, mechanics, production personnel and other crafts to be performed correctly.

G. Performing the Work

1. Avoid doing anything that could reactivate the equipment.
2. Do not bypass the Lock-Out device when installing new piping or wiring.

TRAINING

All employees shall receive training in Lock-Out/Tag-Out in order to comply with OSHA and to assure safe and efficient use of the policy as set forth by Stockdale Building Group, LLC.

1. Each authorized employee shall receive training in the recognition of hazardous energy sources and the methods for its isolation and control.
2. Each affected employee shall be instructed in the purpose and the use of energy control procedures.
3. All other employees shall be instructed about the procedure and about the prohibitions relating to restarting or re-energizing of equipment.

Training in the Limitations of Tags

1. Tags are warning devices and do not provide the physical restraint provided by a lock.
2. Tags are not be removed by anyone except the individual who placed the tag, and are never to be by-passed, ignored, or otherwise defeated.
3. Tags must be legible and understandable.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 9 (continued)

PERIODIC REVIEWS AND INSPECTIONS

Annual or more frequent reviews of the Lock-Out/Tag-Out/Try-Out Procedures shall be performed to ensure their use and evaluate their effectiveness. The review shall be performed by an authorized employee other than the one utilizing the procedures and shall also be designed to correct any inadequacies observed. The review may also include participation between the reviewer and the employee(s) who utilize the procedure. These reviews shall be documented, including but not limited to the date, name of reviewer, and the employee's names involved with the review. Throughout each year, several on-site inspections will be made by the safety director to ensure the management that all policies and procedures are being followed by the employees.

GROUP LOCK-OUT/TAG-OUT/TRY-OUT

Group Lock-Out/Tag-Out/Try-Out devices shall be used in accordance with the established procedures, but not necessarily limited to the following specific requirements:

1. When more than one crew or contractor is involved, assignment of overall job-associated lock-out/tag-out/try-out control responsibility shall be vested in an authorized employee designated to coordinate the affected work force.
2. Each authorized employee for every crew or contractor shall affix a personal lock-out device to the group lock-out device when he or she begins work, and shall remove those devices when he or she stops working on the machine or equipment being serviced or maintained.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 10

SUBJECT: SIGNS, SIGNALS, AND BARRICADES

1. At locations where potential hazards exist, employees shall be responsible for posting, installing and maintaining signs, signals and barricades to detour the passage of persons or vehicles.
2. Barricades must be 42 inches high. Barricades shall be kept back six feet from the edge of excavations, holes, platforms, and roofs.
3. Employees shall obey all signs, signals and barricades which are posted to warn of potential or existing hazards.
4. Flagmen must wear red or orange vests, and the flags must be red or bright orange and at least eight inches square.
5. The selection and use of signs and tags shall be in conformance with ANSI requirements.
6. Red barricade tape is to be used in situations where entry is prohibited or requires special permission. Yellow tape with caution warnings is to be used where entry is allowed as long as the cautions are followed.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 11

SUBJECT: FALL PROTECTION

PURPOSE: It is the policy of Stockdale Building Group, LLC to permit only employees trained in fall protection procedures to work in areas where fall hazards are present, to reduce likelihood of fall accidents and to help ensure a safe workplace.

PRE-WORK CHECK: Prior to beginning work in any area or on any device where fall hazards exist, the following checks must be done:

Stairs

1. All required covers or guardrails must be in place.
2. All handrails or guardrails are in place on stairways.
3. All treads and risers on stairs are in good repair.
4. Non-slip surfaces are in place on stairs.
5. All stairs in this facility meet OSHA and ANSI specifications for design and safety.

Ladders

1. Gripping safety feet in place and secure on ladders.
2. Wooden ladders are coated with suitable protective material.
3. All parts and fittings on ladders are secure.
4. Non-slip surfaces are in place on ladder rungs.
5. When setting ladder up, footing of ladder is secure on a firm, level, and non-skid surface and top of ladder is placed against a solid, stationary object.
6. All ladders in this facility must meet OSHA specifications for design and safety.

Platforms

1. Guardrails are in place and securely attached.
2. Toe-boards are in place and secure.
3. All platforms in this facility must meet OSHA specifications for design and safety.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN #11 (continued)

Floor and Wall Openings

1. All floor and wall openings are safety covered or blocked from access.
2. If not safely covered and blocked from access, the opening has someone assigned for constant attendance to it.

WORK PROCEDURES

1. If any one of the conditions described in Pre-Work Check is not met for the area or piece of equipment posing a potential fall hazard, then do not perform that work until the condition is met.
2. If the situation calls for use of fall protection devices such as harnesses and lanyards because the fall hazard cannot be reduced to a safe level, then the employee must don such protective equipment before beginning the work and use it as intended throughout the duration of the work.
3. Only employees trained in such work are expected to perform it.
4. All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition.
5. The floor of every workroom shall be maintained in a clean and, so far as possible, a dry condition. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats, or other dry standing places should be provided where practicable.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 12

SUBJECT: EXCAVATING AND TRENCHING

- A. Prior to commencing all excavation and trenching operations the following must be performed:
1. The area must be checked for existing utilities by contacting both the Owner and the appropriate Public Utilities.
 2. A competent person must analyze and determine the condition of existing soil conditions to ascertain proper sloping or shoring requirements for the excavation or trench in accordance with OSHA Guidelines as set forth in 1926.606.
 3. All slopes will be excavated to the angle of repose in accordance with OSHA guidelines, except where solid rock allows for line drilling or re-splitting.
 4. Proper barricades must be installed at all open and exposed excavations.
- B. The following must be complied with, at a minimum, during all excavation and trenching operations:
1. Trenches 4'-0" deep or deeper shall be sloped, shored, or have some other means of cave-in protection provided in accordance with the OSHA Guidelines as determined by the competent person.
 2. Supporting systems (shoring, piling, cutting, etc.) will be utilized for all trenches and excavation operations where soil conditions warrant such use as determined by the competent person and sloping and/or benching is not possible.
 3. Loose excavation materials and other materials must be stored at a minimum of 2'-0" from the edge of the excavation or trench.
 4. Adequate means of access and egress must be provided in all excavation.
 5. Stairways, ladders or other safe means of access egress must be placed in trenches over 4'-0" in depth so as to require no more than 25'-0" of lateral travel by employees.
 6. All excavation and trenches shall be regularly inspected by the Contractor's competent person with corrective measures taken as conditions warrant.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 13

SUBJECT: LADDERS AND SCAFFOLDS

REQUIREMENTS:

Ladders

1. Ladder – Attributes
 - a. Manufactured type portable ladders must be equipped with approved shoes.
 - b. Wood side rails must be seasoned, straight grained wood, free from defects that will impair their strength.
 - c. Side rails must be free from splinters and sharp edges.
 - d. Ladders with broken rungs or steps, broken or split side rails, or faulty and defective parts must not be used. Ladders with such defects shall be withdrawn from service immediately and tagged for repair or destruction.
2. Ladder – Field Construction – Job built ladders must be constructed in accordance with the OSHA Construction Standard (29 CFR 1926).
3. Ladder – Use
 - a. Top and bottom ladder areas will be kept clear of debris and materials.
 - b. The pitch on the horizontal will not exceed $\frac{1}{4}$ of the length.
 - c. The top rail of the ladder must extend 36” above the landing or provide grab rails.
 - d. Portable ladders should be placed so that the side rails have secure footing.
 - e. All extension ladders must be tied off securely.
4. Prohibited Ladder Use
 - a. Portable ladders will not be used as horizontal scaffolds, platforms, etc.
 - b. Single short ladders must not be spliced together to provide longer reach.
 - c. Single portable ladders over thirty feet shall not be used. If greater heights must be reached, separate ladders must be used and intermediate landing platforms provided.
 - d. The top two (2) steps of a stepladder must not be used as steps.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN #13 (continued)

Scaffolding

1. Scaffolding – Attributes
 - a. General – all footings must be sound, scaffold erected plumb, and the erection of same supervised by competent personnel.
 - b. Guard rails and toe boards must be installed on all open sides of scaffolds and work platforms 10 ft. or more in height: Minimum – rails 2” x 4”, toe board 1” x 4”, height of top rail to be between 38” and 45”.
 - c. Design load must equal 4 times the intended working load.
 - d. All planking must be full size, rough cut, 2” x 10” minimum dimension scaffold grade or equivalent.
 - e. All scaffolds and work platforms must be a minimum of 2 planks wide.
 - f. When employees are required to work under scaffolds, the scaffold shall be equipped with an 18 ga. x ½” mesh screen wire or its equivalent between toe board and tip of handrail.
 - g. Overhead protection must be provided when overhead hazards exist.

2. Scaffold – Use

All scaffolding must be built and used in accordance with OSHA standard 1926.451 and in accordance with the following:

- a. Scaffolding must be provided for employees engaged in work that cannot be done safely from the ground or from solid construction. Work of a short duration that can be done safely from ladders will be the only exception.
- b. Suspended scaffolding or staging shall be fastened to prevent it from swaying.
- c. Scaffolding or staging more than ten feet above the ground floor, suspended from an overhead support, or erected with stationary supports shall have a safety cable or guardrail and toe boards properly attached. Scaffolds four feet (4') to ten feet (10') in height having minimum horizontal dimensions in either directions of less than forty-five inches shall have standard guardrails and toe boards installed on all open sides.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN #13 (continued)

- d. Guardrails shall be two inches by four inches (2" x 4") or the equivalent and approximately forty-two inches (42") in height and mid rail at twenty-one inches (21"). Supports shall be at intervals not to exceed eight feet (8'). Toe boards shall be a minimum of four inches (4") in height.
- e. All scaffolding should be adequately designed to carry, without failure, four (4) times the maximum intended load.
- f. Where persons are required to work or pass under the scaffold, a screen consisting of No. 18 gauge U. S. Standard wire, one-half inch (1/2") mesh, or the equivalent shall be provided between the toe board and guardrail, extending along the entire opening.
- g. All scaffolds must be maintained in safe condition; scaffolds damaged or weakened by any cause shall be immediately repaired and shall not be used until repairs have been completed.
- h. All lumber used in the construction of scaffolds must be Grade A treated longleaf yellow pine (2" x 12").
- i. All lumber used in the construction of scaffolds should be dressed and must be sound, straight-grained, free from cross-grain, shakes, and large, loose, dead knots, or any defects impairing its strength or durability. All load carrying timber must conform to federal regulations, OSHA 1926.451 (A) (9 & 10).
- j. All nails used in the construction of scaffolds, staging, and supports must be of ample size and length. Nails must be used in sufficient quantities at each connection to develop the designed strength of the scaffold.
- k. When taking down scaffolds, all nails should be immediately withdrawn from the lumber.
- l. Barrels, boxes, loose tile blocks, loose piles of bricks, or other unstable objects, shall not be left on the scaffolding.
- m. The poles, or vertical legs, at scaffolds must be securely and rigidly braced to prevent swaying and displacement.
- n. When materials are being hoisted up on a scaffold, a tag line must be used to prevent the material from striking against the scaffold, unless hoisting equipment is being used and there is no danger of material striking against the scaffold.
- o. Scaffolds must be cleared of all tools, loose materials, and rubbish at the end of each working shift.
- p. An access ladder or equivalent safe access shall be provided

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 13 (continued)

- q. All scaffolds must be inspected by a competent person.
3. Prohibited Scaffold Use
- a. Employees shall not be permitted on scaffolds which are covered with ice or snow. Clinging ice should be removed from all guardrails and uprights, and the planking sanded to prevent slipping.
 - b. Employees shall not work on scaffolds during storms or high winds.
4. Swinging Scaffolds – Attributes
- a. This type of scaffold shall consist of a light platform, supported at the ends by hangers and cables or ropes that are securely attached with proper anchorage at a higher elevation.
 - b. The swinging scaffold platform shall be one of the following three types:
 - (1) Ladder type, consisting of rungs or straight-grained oak, ash, or hickory, at least 1-1/8” in diameter, constructed according to Table D-17 of OSHA 29 CFR 1926.451 (i)(10)(i).
 - (2) Plank type, consisting of planks supported on stirrups or hangers.
 - (3) Beam type, consisting of longitudinal side stringers, with cross beams set on edge and spaced not more than four feet (4’) apart, on which the longitudinal platform planks are laid.
5. Swinging Scaffold – Use
- a. When plank platforms are used, the planks shall not be less than two inches (2”) thick and eight inches (8”) wide.
 - b. All planks must be of uniform thickness.
 - c. Where two (2) or more planks are used, they shall be tied together by cleats, one inch by six inches (1” x 6”), and nailed on the underside of the plank at intervals of no more than four feet (4’).
 - d. The planks shall not extend more than twelve inches (12”) beyond the supporting hangers. However, the planks must extend at least six inches (6”) beyond the supporting hangers.
 - e. A bar shall be nailed across the platform on the underside of each end to prevent the platform from slipping off the hanger.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 13 (continued)

- f. The clear space of the platform planks, between supports, shall not exceed eight feet (8').
- g. When beam type platforms are used, the side stringers shall be of straight grained lumber, free from knots, and not less than two inches by six inches (2" x 6").
- h. The stringers shall be supported on the stirrups or hangers with a clear span between hangers not to exceed twelve feet (12').
- i. The stringer shall be bolted to the hangers by U-bolts passing around the hangers and bolted through the stringers with nuts drawn up tight on the inside face.
- j. The platform shall be supported on cross beams two inches by six inches (2" x 6") cut in between the side stringers, thoroughly nailed thereto, and spaced not more than four feet (4') on centers.
- k. The platform shall not be less than twenty inches (20") or more than thirty-six inches (36") wide overall.
- l. Every swinging scaffold shall be equipped the entire length of the platform, (on the side away from the building), with a guardrail, an intermediate guardrail, or safety cable and a toe board.
- m. The ropes supporting a swinging scaffold shall be of wire, synthetic, or fiber ropes capable of supporting at least six (6) times the rated load, properly rigged into a set of six inch (6") blocks, consisting of at least one double and one single block.
- n. All blocks shall fit the size of rope they carry, and shall be constructed to prevent chaffing the rope running through the blocks.
- o. Suitable padding must be provided at points where ropes are subject to chaffing.
- p. Suitable scaffolds shall not be used for the storage of materials.
- q. Two or more swinging scaffolds shall not, at any time, be combined into one by bridging the distance between them with planks or any other form of connection.
- r. Lifelines, securely fastened from above, must be provided for each person working on a swinging scaffold. The lines shall hang free of the scaffold and shall conform to OSHA 1926.104.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 13 (continued)

6. Steel or Patented Scaffolds, Etc. – Use
 - a. Check and follow local, state, and federal codes, ordinances, or regulations pertaining to scaffolding.
 - b. Inspect all scaffold parts before using. Never use scaffold parts that have been damaged or deteriorated.
 - c. Keep all equipment in good repair. Avoid using rusted equipment. (The strength of rusted equipment is not known.)
 - d. Provide adequate sills for scaffold posts and use base plates.
 - e. Use adjusting screws instead of blocking to adjust the scaffold if uneven grade conditions exist. (Screws shall not be adjusted more than 12” in height.)
 - f. Fasten all braces securely. Do not climb braces.
 - g. On wall scaffolds, place and maintain anchors securely between structure and scaffold at least every twenty-five feet (25’) or length and twenty-five feet (25’) of height.
 - h. Equip all planked or staged areas with proper guardrails and toe guards when required.
 - i. Power lines near scaffolds are dangerous. Exceptional care must be taken and no scaffold should be within ten feet (10’) of a bare or un-insulated power line.
 - j. Do not use ladders as makeshift devices on top of scaffolds to increase the height.
 - k. Drawings and specifications of all frame scaffolds over one hundred twenty-five feet (125’) in height above the base plates shall be designed by a Registered Professional Engineer and copies made available to the employer for inspection purposes.
 - l. Do not overload scaffolds.

7. Rolling Scaffolds – Use
 - a. Do not ride rolling scaffolds.
 - b. Remove all material and equipment from platform before moving scaffold.
 - c. Caster brakes must be applied at all times when scaffolds are not being moved.
 - d. Do not, in any manner, attempt to move a rolling scaffold from the top. Watch out for holes in the floor and overhead obstructions.
 - e. Use horizontal diagonal bracing near the bottom, top, and at intermediate levels of twenty-five feet (25’).
 - f. The working platform height of a rolling scaffold must not exceed four (4) times the smallest base dimension unless guyed or otherwise stabilized.

CORPORATE SAFETY MANUAL

STOCKDALE BUILDING GROUP, LLC

SITE-SPECIFIC HAZARD COMMUNICATION PROGRAM

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 14

PROGRAM ABSTRACT

Stockdale Building Group is committed to providing each of its employees a safe and healthy work environment. Environmental processes and other operations performed at various SBG job sites sometimes require the use of materials and chemicals that can be hazardous if not handled properly. When using these substances, it is important that workers are aware of the identity of the substances, as well as the toxic or other hazardous properties of the chemicals; since an informed employee is more likely to be a careful employee. Therefore, in an effort to promote and maintain job sites that are free from controllable safety and health hazards, Stockdale Building Group has implemented this Hazard Communication Program to protect its employees.

EMPLOYEE RESPONSIBILITY

The success of this Hazard Communication Program depends to a great extent upon the cooperation of every employee. Employees should: be alert to the potential hazards in their work areas; know and understand the hazards of those chemicals; consult the Material Safety Data Sheets (MSDS) for the specifics concerning the hazardous chemicals with which they work; follow the appropriate safe working procedures that have been established; wear required personal protective equipment; and actively participate in the training programs implemented to protect their health and safety.

Active employee participation in SBG's Hazard Communication Program will result in the continued reduction of the incidences of chemical related illnesses and injuries at SBG's job sites. This written program will be available at the SBG's job sites for review by any interested employee. A master copy of this program will also be maintained at the Corporate Office.

PROGRAM MANAGER/COORDINATOR

The Program Manager/Coordinator of the OSHA Hazard Communication Program is the Company President / Safety Director at the Corporate Office. The Company President / Safety Director can be reached at the following telephone number (205) 907-4199 during normal office hours of 8:00 a.m. to 5:00 p.m. Monday through Friday as well as in the case of emergencies outside the normal office hours.

The President / Safety Director is responsible for the effective implementation of this program, and continuing update requirements. The President / Safety Director will establish the specifics of the "Hazard Communication" Policy and coordinate the efforts and activities of employees and management.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 14 (continued)

CHEMICAL INVENTORY

The Project Superintendent is responsible for developing and compiling a hazardous chemicals inventory list which identifies all hazardous chemicals used by SBG employees on a particular project. This list will be kept on the project as part of this program with a copy sent to the President / Safety Director.

The list will also be posted at the job site for employee information. Copies will be provided to any SBG employee or sub contractor authorized representative upon request to the President / Safety Director or Project Superintendent.

MATERIAL SAFETY DATA SHEET (MSDS) POLICY

The President / Safety Director has the overall responsibility for establishing and monitoring the MSDS Program. He will ensure that procedures are developed to obtain the necessary MSDS's for all substances and chemicals which are known to pose a health or physical hazard to SBG employees who are exposed to them. He will review all incoming or updated MSDS's for new or significant health and safety information and pass it on to affected employees. A master copy of all complete and current MSDS's will be maintained and updated as necessary. The President / Safety Director will assign responsibilities to Project Superintendents for MSDS maintenance at each job site. He will ensure that current MSDS's for all chemicals and substances at the site are available to employees. If an MSDS is not available upon request, the President / Safety Director should be contacted. Periodically, the Project Superintendent shall check the MSDS collection for completeness.

CONTAINER LABELING POLICY

The President / Safety Director is responsible for enforcing SBG's in-house labeling system. In general, SBG will rely on the manufacturer's applied labels whenever possible and will ensure that these labels are maintained in a legible condition. Containers which are not labeled or on which the manufacturer's label has been removed will be re-labeled. SBG will ensure that each container is labeled with the identity of the hazardous chemical contained and any appropriate hazard warnings.

Project Superintendent will verify that all containers received from manufacturers, suppliers, or importers used by employees are clearly and appropriately labeled. All chemicals on site will be stored in their original or approved containers with proper label attached. Any container not labeled shall be corrected by labeling or proper disposal. Workers may dispense chemicals from original containers only in small quantities intended for immediate use. Any chemical left after work is completed must be returned to the original container. At no time should any unmarked containers of any size be left in the work area after work is completed. Project Superintendent has the responsibility of monitoring any on-site deficiencies which occur during day-to-day operations.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 14 (continued)

EMPLOYEE INFORMATION

Employees will be informed of, and will have access to, all relevant information, including this document and the standard itself, which can be found on the job site or in the office of the President / Safety Director. MSDS's are located in master copy form in the President / Safety Director's office. Relevant copies of a particular MSDS are made available to employees or their authorized representative upon request. Information pertaining to operations in which hazardous chemicals are present will also be provided to employees.

EMPLOYEE TRAINING

The President / Safety Director is responsible for the effective employee training and information programs.

Employees will be trained to work safely with hazardous chemicals. Employees training shall include:

1. An overview of the requirements contained in the Hazard Communication Standard.
2. The locations of the MSDS file and written Hazard Communication Program.
3. The content and importance of material safety data sheets and labels.
4. The methods and observations that may be used to detect the presence or release of a hazardous chemical.
5. Physical and health hazards associated with chemicals.
6. Methods used to protect employees.
7. Safe work procedures, emergency responses and use of personal protective equipment.

HAZARDOUS NON-ROUTINE TASKS

Periodically, employees are required to perform hazardous non-routine work. It is SBG's policy that such operations not be undertaken until the employees have been provided information on the possible undesirable effects that may arise during such operations. Prior to starting the work, each affected employee will be given this information by the Project Superintendent. This information will include the chemical and physical hazards associated with the chemical, required personal protective equipment used, and the steps that the company is using to reduce the hazards. When necessary, areas will be posted to indicate the nature of the hazard involved.

EMERGENCY PROCEDURES

In the event of an overexposure to or spill of any hazardous chemical, the President / Safety Director will be notified at once. The Project Superintendent will be responsible for insuring that proper and appropriate emergency response actions are taken. The appropriate material safety data sheet pertaining to the chemical or substance will serve as reference for such actions.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 14 (continued)

MULTI-EMPLOYER JOB SITES

It is the policy of Stockdale Building Group to adequately apprise other contractors regarding the hazardous substance which their employees may be exposed to during the course of the day-to-day construction activities. Contractors, whose employees may be exposed to hazardous substances, will be given access to the Hazard Communication Program. This will provide all relevant chemical information necessary to protect their employees.

Contractors should be informed of conditions existing on-site which necessitate special precautionary measures through weekly safety or tool box meetings.

Subcontractor's employees are also required to adhere to the provisions of the Hazard Communication Standard. They shall make available copies of MSDS's for all hazardous materials used by their employees which can be reviewed by SBG. MSDS's shall be provided within a reasonable time period after such a request.

Stockdale Building Group is committed to it's employees' health and safety, and such requires all sub-contractors whose employees work around and among SBG employees to also be knowledgeable on chemical safety and appropriate working procedures in an effort to reduce and eliminate chemical exposures to themselves, as well as the other workers.

CORPORATE SAFETY MANUAL

SAFETY BULLETIN # 15

STORM WATER POLLUTION PREVENTION PROGRAM

See attached SWPPP