LMM SAFETY AND HEALTH MANAGEMENT SYSTEM

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MANAGEMENT COMMITMENT TO SAFETY

At Lee Machinery Movers, Inc. (LMM), we believe that company culture can directly influence a safety and health management system. Management will play a major role to ensure LMM develops and continuously grows a world class safety culture. This commitment requires managing safety as we would any other organizational function. Integrating safety into our overall operation, becoming personally involved and committed, and establishing accountability for safety at all levels within our organization. We are committed to constantly growing and strengthening our competencies and world class partnerships, with our customer base, also with MIOSHA, Federal OSHA, the DOL, and all other applicable regulatory agencies.

At LMM, the commitment to Safety is an extension of our core philosophies.

Our commitment to safety excellence is emphasized by:

Management's commitment and accountability to provide a safe and healthy work environment.
Encouraging open communication between all project personnel; *soliciting input, support, and action to achieve an injury-free environment.*
Providing the proper training and tools to help ensure employee safety and project success.
Promoting safety as a value rather than a directive and extending that value into all areas of our lives.

At LMM, Safety is everyone's responsibility. As a condition of employment with LMM, all employees are accountable to adopt safety as a value and comply with the Best Practices of the highest level of Environmental, Safety and Health Standards and Guidelines.

SAFETY UNCOMPROMISED!

Contents

Section 1: Responsibilities

This health and safety program aims to adhere to recognized standards. For a program to be effective, it must include appropriate attitudes toward injury prevention from management, supervisors, and employees, along with managing materials and processes that affect the environment. The program aims to enhance efforts from all employees to achieve an injury-free workplace while raising awareness of the environmental impact of our processes.

Following safety rules and practicing safe work habits demonstrate our concern for everyone's safety. Conserving energy, utilities, raw materials, and managing waste properly show our commitment to the environment.

Project Manager

The Project Manager (PM) connects corporate management with field labor. The PM oversees the Safety Program implementation at the operational level and may delegate these duties to staff members while ensuring they are completed.

- **COMMUNICATE** all corporate safety policies and procedures for the project staff and field supervision.
- **PLAN** the work in such a way as to minimize the possibility of injury, property damage, or other events, which would have an adverse impact upon the company or its employees. Have emergency procedures prepared in advance and post numbers in a common, easy to find area.
- **ASSIST** in the establishment of job-site safety rules and procedures, along with emergency procedures, for the individual project.
- **LEAD** by example; initiate and follow good work procedures and safe work practices.
- **INVESTIGATE** all serious or potentially serious incidents, including lost time accidents, and report the findings to management.
- **EDUCATE** all employees under your supervision on the safe and proper methods for performing their tasks. This should be accomplished with the guidance of the Competent Person, General Foreman, and Foreman.
- **INSPECT** your entire job area weekly for unsafe conditions and actions and take corrective action if needed.
- **PROVIDE** first aid activities; arrange for medical treatment and any necessary transportation for the injured person.
- **MAINTAIN** a liaison with local fire and rescue services, hospitals, utility companies, etc., in the event their services may be required.
- **PREPARE** and **MAINTAIN** all reports and records regarding safety and insurance, as may be required by this manual and by local, state and federal law. This includes a list of hazardous materials on the site along with their SDS.

Competent Person

Competent Persons are designated individuals who ensure that field operations are conducted safely and efficiently. They bear the responsibility of preventing accidents within their area of oversight. These individuals must thoroughly understand and adhere to the company's Safety Policies and Procedures while exemplifying these standards to their employees. Their key safety responsibilities include the following:

- **CONDUCT** job site hazard analyses and explain and mitigate any inherent hazards to employees.
- **INVESTIGATE** all incidents which occur in areas under their control, providing the Project Manager with as much information as possible. "Incidents" is intended to mean accidents, injuries, property damage, and near misses.
- **INSPECT** the areas under their control for safety on a daily basis; insist on good housekeeping, and make sure that tools and equipment are inspected and used properly.
- **ATTEND** and participate in all safety meetings as scheduled by management.
- **FAMILIARIZE** themselves and their employees with the established job emergency procedures and with the location and use of fire fighting, rescue, and first aid equipment.
- **DOCUMENT** all orientations, meetings, reports, reprimands, inspections, and similar activities. Ensure these records are filed at the jobsite and copies are sent to the Corporate Office's Safety Department.

Foreman

Foremen are a major player in the Safety Program because they are the individuals in constant contact with employees on the job site. They establish the conditions under which their employees work and control their scope of work throughout the day. They shall:

- **SET** a good example by following safe practices in all activities.
- **SUPERVISE** employees to ensure work complies with instructions.
- **SEE** that good housekeeping is maintained.
- **ENFORCE** the use of personal protective equipment as prescribed by Local, State and Federal law, the LMM Safety Department, and the Contract Owner.
- **SUBMIT** a report of all employee injuries, regardless of severity.
- **ATTEND** and participate in all safety meetings as scheduled by management.
- **INFORM** all employees about potential hazards, company regulations, equipment, and procedures to ensure their safety at work.
- **EDUCATE** employees about the Job Emergency Procedure.
- **REVIEW** all applicable SDS forms with employees on the job site.

Craftsman/Tradesman

Craftsmen/Tradesmen shall be responsible for but not limited to the following:

- **FOLLOW** all Local, State, and Federal safety regulations while performing assigned tasks.
- **NOTIFY** project Supervisor(s) of any safety concerns prior to start of work.
- **WEAR** all required PPE.
- **ATTEND** and participate in all required safety meetings.
- **UNDERSTAND** and follow all Local, State, Federal, Company, and Customer Emergency Procedures.
- **REVIEW** and understand LMM's policies and procedures as directed.

Management

Managers shall be responsible for but not limited to the following:

- **ENSURE** that Project Managers, Competent Persons, Foremen, and Craftsmen (Project Team) are adhering to their responsibilities.
- **ELIMINATE** obstacles hindering the Project Team's safety success.
- **PROVIDE** support to the Project Team in addressing employee complaints about safety issues when the Foreman is unable to resolve them.
- **EDUCATE** and motivate the Project Team on safety to prevent injuries. Demonstrate a proper safety attitude and awareness.

Safety Department

The Safety Department shall be responsible for but not limited to the following:

- **SUPPORT** and promote the application of reasonable safety practices and procedures as posted by the Company as well as all Local, State, Federal, Company, and Customer regulations.
- **REPORT** any actual or potentially unsafe working conditions to the Project Team and management for corrective action.
- **IDENTIFY** areas of improvement and coordinate safety training with the Human Resources department as necessary.
- **ASSIST** the Human Resources Department with managing workers' compensation cases.

Human Resources Department

The Human Resource Department shall be responsible for but not limited to the following:

- **ASSIST** with coordination of employee safety training.
- **ASSIST** Management and the Project Team(s) with ensuring that all employees understand safety rules and regulations.
- **MANAGE** all workers' compensation cases with assistance from the Safety Department, Management, and the Project Team as necessary.

Safety Enforcement Procedure and Discipline

Prior to the beginning of a project, a safety kick-off meeting will be held. The Project Manager will introduce the project Safety Representative to the entire management team, which includes all Foremen and Competent Person(s). The Project Manager will allow the Foremen/Competent Person to go over the Job-Site Safety Rules and the rules of enforcement.

LMM employees are expected to always conduct themselves in a professional, businesslike manner, to respect their fellow employees and supervisors, and act within the bounds of our social customs and laws.

Entry onto an LMM project site constitutes consent to and recognition of the right of LMM and its authorized representatives to search the person, lunch box, toolbox, automobile, and other property of the individuals while on the work site. All employees on the site are expected to abide by the rules and conduct as outlined in this safety and health manual. It should be understood that LMM is not restricting itself to these rules as the only cause for eviction from the jobsite.

Additional rules required for the safety and welfare of employees and company, on a particular project, are contained herein, and will be posted on the project bulletin board as required. The following job-site disciplinary guidelines are used to provide consistent management of employee safety incidents. The Foreman/Competent Person is responsible for the safety of his crew. Therefore, they are also subject to disciplinary action for unsafe actions committed by an employee under their direct supervision. Adherence to the Job-Site Safety Rules of the project is a condition of employment with LMM. Any customer, prime contractor, or other applicable entity policy shall supersede LMM policy if more stringent.

The senior most LMM person will explain the system of written safety violations that will govern the project as follows:

- All employees will have a company safety orientation that will cover the rules and regulations, along with the disciplinary actions that will take place should they not be followed.
- The Foremen/Competent Person is the individual required to enforce the Job-Site Safety Rules.
- The Foremen/Competent Person is required to identify situations that are unsafe and to assist management by pointing out violations to the Job-Site Safety Rules.

When Job-Site Safety Rules are violated, the Foremen/Competent Person shall initiate disciplinary action as follows:

Class 1 Violations: Violations that can result in death or serious physical harm.

- On the first occasion the individual shall receive a written disciplinary warning, possible project reassignment if requested by Contract Owner or Project Manager, or a written separation notice depending on severity – copies to the employee and the employee's file.
- On the second occasion the individual shall receive a Written Disciplinary Warning and be suspended from all work for ½ or full day without pay or Written Separation Notice depending on severity or possible project reassignment if requested by Contract Owner or LMM Project Manager. The individual will be retrained and documented as such – copies to the employee and the employee's file.
- The third occasion will result in a Written Separation Notice given for immediate termination.

Examples of Class 1 Violations include but are not limited to:

  - Riding a headache ball or load.
  - Working in elevated areas, more than 6 feet, without a full body harness and/or not tied off.
  - Removing another person's lockout.
  - Working in elevated areas out of a manlift without a tie-off.
  - Failure to use a proper lockout procedure.
  - Entering a confined space without proper testing of an atmosphere and/or required permits not obtained.
  - Riding on the forks of a forklift.
  - Working under suspended load without blocking.
  - Attempting to work while under the influence of drugs, alcohol, or both.
  - Other violations that could result in death or serious physical harm.

Class 2 Violations: Violations, which at management's discretion do not fit the category of Class 1 Violations but are a violation of recognized standard safety practices or rules.

- On the first occasion the individual receives a verbal warning that is documented or possible project reassignment if requested by Contract Owner or LMM Project Manager.
- On the second occasion the individual shall receive a Written Disciplinary Warning or possible project reassignment if requested by Contract Owner or LMM Project Manager – copies to the employee and the employee's file.
- On the third occasion the individual shall receive a Written Disciplinary Warning or possible project reassignment if requested by Contract Owner or LMM Project Manager – copies to the employee and the employee's file. The individual will be retrained and documented as such – copies to the employee and the employee's file.
- The fourth occasion will result in a Written Separation Notice given for immediate termination.

Examples of Class 2 Violations include but are not limited to:

  - While working in any type of manlift (including but not limited to a scissors lift, boom lift, etc.) without a full body harness and/or not tied off.

- Use of power tools without proper guards.
- Using an electrical extension cord with the ground plug missing.
- Welding or cutting without a fire watch, or a fire extinguisher.
- Welding or cutting without a Hot Work permit when required by the site.
- Transporting tools or materials in your hands while climbing up or down a ladder.
- Use of any operated equipment without thorough adherence to the operating policies and procedures governing such equipment.
- Ignoring or removing red barricade tape.
- Failure to use personal protective equipment.
- Smoking in a non-smoking area (unless imminent danger in which case it would fall under a Class 1 violation).
- Failure to comply with OSHA, MIOSHA, ANSI rigging standards or contract owner requirements.
- Failure to inform supervision of an accident, injury, or near miss.
- Other violations of recognized standard safety practices or rules.

Documentation

The employee will be provided with copies of all progressive discipline documentation. The employee will be asked to sign copies of this documentation attesting to their receipt and understanding of the corrective action outlined in these documents.

LMM will exercise the progressive nature of this policy by first providing verbal warnings, final written warning and/or suspension from the workplace before proceeding to a recommendation to terminate employment. However, LMM reserves the right to combine and skip steps depending upon the circumstances of each situation and the nature of the offense. Furthermore, employees may be terminated without prior notice or disciplinary action.

Section 2: Accident and Injury Prevention Policies and Procedures

Policy – Hazard Recognition Activities

It is the policy of LMM that all employees will be educated to recognize the hazards and potential hazards in their work areas and their surroundings. Employees will also learn, consistent with their level of responsibility, the actions appropriate to eliminate or control those hazards as required by Local, State and Federal Safety Laws, as well as LMM and Contract Owner requirements.

Pre-Job Planning

An important factor in the success of any safety program is planning. Planning a job with health and safety in mind provides a clear set of directions for the protection of the employees and reduces the possibility of having to change operations and ultimately reduces job costs. In keeping with our goals of high quality and reasonable costs, it is the policy to consider safety as an integral part of the pre-job plan.

In the Bidding Process

Estimators must include costs for all items required by law, such as but not limited to, hard hats, steel-toed boots, guardrails, and fire extinguishers. These items are obvious by the nature of the work. The

Safety Department will, at the request of the project owner, review bid documents and drawings for the purpose of determining the nature and extent of any special exposures or hazards. The Safety Manager will provide estimating with as much information as possible regarding special safety equipment or operations that may be dictated by a particular project.

Pre-Work Survey

Whenever unusual work, or work outside the normal scope on a project actually begins, the Safety Department will survey the work area with the Project Manager and/or an Owner's representative as necessary for the purpose of determining any special hazards or exposures. The results of this survey and any suggestions will be provided in writing. A Daily Pre-Task Hazard Analysis will be completed prior to each task. The Foreman is responsible for reviewing the task, hazards, and protective measures to be taken.

New Employee Orientation

All new employees will receive basic instruction related to the particular job they will perform. A detailed Orientation Agenda on contract owner projects may be required for specific jobsites.

Management Personnel

All Management and (Leadership) Project Staff Personnel (i.e., Managers, Engineers, and Competent Person) shall attend periodic planning meetings, on a project basis and/or as needed. These meetings will begin with a focus on safety and include ample time for safety planning, education, and discussion, including lessons learned, as part of their agenda. Management and Project Staff Personnel shall make themselves available to attend safety and health training, programs, and seminars that are advised or offered by the LMM Safety Department or other applicable entities such as but not limited to CAM, AGC, OSHA, MIOSHA, applicable insurance carriers, contract owners and other responsible organizations.

Craft Employees

All craft employees are required to attend regular "Toolbox Safety Meetings", held on their project and any special safety meetings specifically related to their work. They also may participate in Job safety Analysis activities and reviews. Subject material is available in the Toolbox Talks Binder issued to each Competent Person / Foremen and upon request from the Safety Department.

Personal Protective Equipment

LMM intends that every employee will use all personal protective equipment, which is indicated for the task being performed. PPE must be maintained in a sanitary and reliable condition and at a minimum meet all OSHA, MIOSHA and Contract Owner requirements. The use and maintenance of the required PPE is a matter of law and is therefore a condition of employment. Damaged equipment shall be removed from service.

LMM Shop & Field Personnel Minimum PPE Requirements

- **Safety Glasses**: Clear ANSI Z87 Safety glasses with side shields required to be worn 100% of the time.
- **Hearing protection**: Required to be on person/in possession, must be worn when exposed to 85db or greater, when required by task being performed, or when required by site/customer.
- **Hard Hat**: To be worn 100% of the time

- **LMM Hi Vis Vest**: To be worn 100% of the time, unless task being performed requires the absence of loose clothing to remain safe.
- In addition to the above PPE, all LMM employees will wear long pants (no sweatpants/athletic style pants), sturdy work boot/shoe type footwear, and shirt with a minimum 3 inch sleeved (no cutoffs/tank tops).
- At LMM Shop, epoxy area around wooden table and pathway adjacent to shelving following yellow lines to back door are exempt areas.

Additional PPE:

May be required based on tasks being performed and/or customer requirements, including but not limited to:

- Face shield/halo when grinding, sparking, torching, cutting with appropriate shade level face shield
- Type II Hard Hats with Chin Strap
- Task-specific gloves, such as various cut levels, welding/hot work gloves, and or dictated by customer.
- FR Clothing based on hot work/sparking tasks, burn jackets, 'greens', et al
- Long coat/ 'greens' based on applications/tasks that could produce debris or sparks
- Metatarsal boots, respirators, clean room Tyvek suits may also be additional PPE. Additional PPE usage may require specific trainings and or medical surveillance programs.

LMM Mechanic Bay Minimum PPE Requirements

- **Safety Glasses**: Clear ANSI Z87 Safety glasses with side shields required to be worn 100% of the time inside of LMM's shop areas.
- **Hearing protection**: Required to be on person/in possession, must be worn when exposed to 85db or greater, when required by task being performed.
- In addition to the above PPE, all LMM employees will wear long pants (no sweatpants/athletic style pants), sturdy work boot/shoe type footwear, and shirt with a minimum 3 inch sleeved (no cutoffs/tank tops).

Additional PPE:

May be required based on tasks being performed and or customer requirements, including but not limited to:

- Face shield/halo when grinding, sparking, torching, cutting with appropriate shade level face shield
- Type II Hard Hats with Chin Strap
- Task-specific gloves, such as various cut levels, welding/hot work gloves, et al.
- FR Clothing based on hot work/sparking tasks, burn jackets, 'greens', et al
- Long coat/ 'greens' based on applications/tasks that could produce debris or sparks
- Metatarsal boots, respirators, clean room Tyvek suits may also be additional PPE. Additional PPE usage may require specific trainings and or medical surveillance programs.

***If an employee that primarily works within this area is directed to work elsewhere in the shop or at a customer site, all standard LMM PPE requirements will take effect.**

Specialized Equipment

In some cases, such as those involving chemical exposure, special equipment may be required for personal protection. The Safety Team, with the aid of third-party entities, will ascertain what the exposures are and will provide the project with a detailed list of requirements for those particular exposures.

Job Site Audit and Inspection

It is the policy of LMM that random jobsites will be audited and inspected. The inspection program will consist of two categories: (1) the Competent Person Audit Report, and (2) the Joint Job-Site Audit and Inspection.

Each Project Manager will be responsible for the implementation of this inspection program on their project. The Safety Manager will act as a consultant and advisor for specific or extraordinary conditions. The Safety Manager will monitor the effectiveness of the program, reporting the results to the management team. These inspections are designed to ensure that top management will be directly involved with the safety of all LMM projects.

The Competent Person/Foreman will make a total walk-through of the project periodically, noting the site conditions and employee practices. They will keep a written record of all the following: the field site conditions, including the actual physical conditions on the project. Examples: proper guardrails, shoring and sloping of excavations, housekeeping, electrical codes, ladders and scaffolds, fire extinguishers, use of fall protection equipment, and any other potentially dangerous conditions. Employee work practices, such as: the use of PPE, proper tie-off as work dictates safe use of tools and equipment, etc.

Fire Prevention and Protection

The danger to employees, financial loss to our clients and company, and the hazards posted to the general public, make the prevention of fire one of the most important safety responsibilities on a construction project. It is the policy of LMM that every employee becomes familiar with and practices good fire prevention habits in all phases of his or her daily activities. To accomplish this, fire safety practices and fire extinguisher use, and operation is covered with authorized employees on a task specific basis.

- Storage and Use of Flammable and Combustible Materials.
- Flammable materials such as gasoline, diesel fuel, propane, and solvent should always be stored outside of building areas.
- Storage areas must be well marked with “Flammable” and “No Smoking” signs and containers must be marked with actual contents.
- Storage areas are to be kept clear of trash, debris, combustible construction materials, and heat or spark sources.

- Fire extinguishers must be kept 25-75 feet from the storage area.
- Portable containers for flammable liquids (mostly gasoline) shall be only approved Safety Cans.
- Combustible materials such as cardboard boxes full of new fixtures, wood, plastics, and rubber goods should be stored neatly, with room between stacks, in areas either outside of occupied buildings or in areas where automatic fire protection is available.
- Combustible trash must be removed from work areas every day.
- All gas cylinders will be stored in a secured upright position.
- Oxygen should be separated from flammable gases by 20 feet or a firewall.

Fire Suppression Equipment:

Every project will maintain a supply of fire extinguishers of the type that are suitable for hazards involved. Fire extinguishers shall be kept in all job offices, and at easily accessible locations around the work area. All employees should be familiar with the location and use of the fire extinguishers. Fire extinguisher locations should be clearly marked. A fire extinguisher must be located at every burning or welding operation.

- Fire extinguishers will be given a visual inspection monthly.
- Fire extinguishers shall be tagged indicating current inspection report.
- Equipment found to be defective will be immediately replaced.
- Equipment being used for Hot Work will be inspected prior to any Hot Work being performed.

Temporary Heating:

- Temporary heating units must be in safe working order and have tip over and flameout switches; closed flame type units are much preferred.
- Heaters shall be set up on non-combustible surfaces and shall have a minimum of 5-feet clearance to the nearest combustible objects in all directions.
- Extra fuel for heaters shall be stored outside the building.
- Burning barrels, buckets, or open fires of any type are strictly prohibited on LMM property and customer job sites.

Local Codes and Requirements:

In many areas of the country, local fire prevention codes are stricter than the OSHA, MIOSHA requirements. Generally, the local Fire Chief or Fire Marshal will provide assistance to the Project in the area of code compliance.

Burning and Welding Hot Work Permits:

The creation of a permit system for burning and welding operations should be based on the needs of a particular site. The permit system is more than a normal fire prevention system. A burn and weld permit

system provides independent checks on, and regulation of, work methods which might cause a hazard of fire. The permit system must be managed independently of job production, but in cooperation with production needs.

Once a permit system is chosen, it must be used and enforced for the entire jobsite and must include all personnel. Permit systems will be tailored to the needs of the individual job. While there may be many additions, the following items form a basic permit system guideline:

- Once it is decided to use a burn and weld permit system, no welding, burning, soldering or other flame producing operation may be performed without a burn and weld permit.
- Burn and weld permits (cards) are obtained from the Owners Rep. and the permit must be signed and dated by that rep.
- The job Foreman fills out his portion of the permit showing the location and type of work to be performed and posts it at the work area.
- The Fire Marshal, Contract Owner or Security, Safety Department Rep. inspects the work area and either approves or denies the permit, writing in any specific additional precautions required for the particular operation.
- Permits are only good for the time frame specified by Customer/Contract Owner Rep. when expired, a new permit must be obtained.

The Fire Marshal or Safety Department may revoke or cancel burn and weld permits at any time. The reason for cancellation may be either a change in area conditions or failure of the user to obey the requirements on the permit. Persons found to be burning or welding without a valid permit will be subject to disciplinary action. Fire extinguishers or water hoses shall be available at ALL flame producing operations. CONTRACTORS and/or SUBCONTRACTORS are required to provide their own fire extinguishers.

Fire prevention is a primary responsibility. In some cases, a nonworking fire watch may be required. Persons acting as fire watch must be thoroughly familiar with the emergency procedures established for the area. Fire blankets or other suitable barrier material shall be placed between the hot work and the adjacent structures or personnel. Contractors are required to take all steps, whether specifically written on the permit or not, necessary to protect life and property from the hazards of their burning and welding operations.

Heavy Equipment and Tools Maintenance and Inspection

Unsafe or improper equipment in the hands of even the most conscientious worker creates a danger to everyone. Therefore, it is the policy of LMM that all tools and equipment will be in correct working order at all times or will be removed from service. All equipment must be inspected daily prior to each shift. All operators' manuals must be on the equipment. All placards visible.

- Heavy Equipment - General Requirements heavy equipment shall mean loaders, backhoes, breakers, skid-steer, loaders, ride-on compactors, industrial tractors, fork trucks, draglines, cranes, and similar pieces of equipment.

- All equipment left unattended at night near highways or work in progress shall have lights, reflectors, or reflective barricades.
- When heavy equipment is capable of lifting material above the level of the operator, it must be equipped with an overhead guard.
- No operator shall use heavy equipment on a slope unless it is equipped with a rollover protection system (ROPS).
- When parts of heavy equipment are suspended aloft, they shall be blocked or cribbed if employees are expected to work under them.
- Dump bodies, buckets, and blades must be in a fully lowered position with controls in neutral when the equipment is not in use. The same applies when repairs are ordered, unless the repair requires different treatment.
- Whenever equipment is parked, the parking brake must be set.
- When parking on an incline, the operator shall also chock the wheels.
- When working within the vicinity of power lines, employees must keep themselves and equipment at least 20 ft from lines until voltage is known. If voltage is known, refer to MIOSHA part 10 table A for reference. No closer than a 10 ft distance shall ever be achieved. If over 350kV, new distances shall be used, in accordance with Table A.

TABLE A—MINIMUM CLEARANCE DISTANCES

Voltage (nominal, kV, alternating current)	Minimum clearance distance (feet)
up to 50	10
over 50 to 200	15
over 200 to 350	20
over 350 to 500	25
over 500 to 750	35
over 750 to 1,000	45
over 1,000	(as established by the utility owner/operator or registered professional engineer who is a qualified person with respect to electrical power transmission and distribution).

Note: The value that follows "to" is up to and includes that value. For example, over 50 to 200 means up to and including 200kV.

- A competent person must begin a visual inspection prior to each shift in which the equipment will be used. The inspection must consist of observation for apparent deficiencies.
- Prior to initial use, equipment that has had a repair or adjustment that relates to safe operation must be inspected by a qualified person after such a repair or adjustment has been completed.

Heavy Equipment - The Operator:

Only qualified employees shall operate heavy equipment. A qualified employee shall be:

- One who has read and understood the written instructions, rules, and regulations for the equipment.
- One who has taken training on the equipment and trained by a knowledgeable, experienced and competent trainer.
- One who has gone through recertification according to requirements.
- One who has all training that is documented according to requirements.
- One who has obtained company authorization to operate the equipment.

Operators will be observed, and those who exhibit behaviors or work practices that call question to their abilities will be retrained or removed from the equipment.

- No employee, except the operator, shall ride on the equipment.
- No employee shall ride in the loader bucket or the backhoe bucket.

The operator shall be responsible for routine field maintenance of the equipment, such as visual inspection, fluid level checks, tire inflation, hydraulic leaks, etc.

- The operator shall report any serious defect to the immediate supervisor.
- The operator shall not get off the tractor while the tractor is in motion.
- Before getting off, the operator shall shut off the engine, lower the buckets or forks to the ground, and apply the parking brake.

Heavy Equipment - Forklift Trucks:

Forklift operators must be trained and evaluated. A certification card will be issued with the name of the operator, the date of the training and/or evaluation, and the identity of the person performing the training and/or evaluation.

- Operators must keep seatbelts securely fastened.
- Powered industrial trucks shall meet the standards of general requirements and the operator above.
- The rated capacity of forklift trucks must be clearly displayed on the vehicle in a manner that is easily visible to the operator. These ratings must not be exceeded.
- No modifications or additions that affect capacity or safety shall be made without the written approval of the manufacturer. If changes are made, new capacity signs shall be clearly posted.

- If a load is lifted by two or more trucks, the total load carried by any one truck shall not exceed its limit.
- Steering knobs shall not be affixed to the steering wheel unless the steering mechanism has a road reaction prevention device. The knob shall be posted within the circumference of the wheel.
- All high lift trucks shall have an overhead guard.
- All inspection, maintenance, and operating procedures found in the operator's manual shall be followed in the care and operation of the vehicle and be located on the vehicle as well.
- If driving a lift truck into a docked trailer the trailer must be chocked and secure.

Heavy Equipment – Manlifts (MEWP):

Operators of manlifts shall have an Aerial Lift Platform Permit to operate prior to running the piece of equipment. Training or orientation of manlift usage shall be the responsibility of the safety department or a 3rd party vendor, and operators shall have a certification card to demonstrate their competence.

Heavy Equipment - Telehandlers:

- Only qualified employees shall operate a skid-steer loader.
- While using this equipment, the operator shall keep the seat belt fastened, the seat bar lowered, and both feet on the pedal controls.
- Operators shall keep loads within the capacity of the equipment to prevent forward overturn. Loads must be carried as low as possible.
- When using the machine in enclosed spaces, the operator must exhaust the fumes to the outside.
- Before leaving the machine, the operator shall lower the lift arm, put the attachment flat on the ground, stop the engine, engage the parking brake, raise the seat bar, and move the pedals until they lock.

Tools - Power Driven:

- All power-driven tools: gasoline, diesel, electric, compressed air, or hydraulic, shall be maintained in accordance with the manufacturer's standards.
- All guards, keepers, locks, and other safety devices shall be used as intended by the manufacturer.

- Power driven equipment shall not be modified or altered without written permission from the manufacturer.
- Operating manuals shall be available for all power-driven equipment.
- Competent Persons and Foremen shall ensure that employees who operate power equipment are familiar with all operational safety information provided in the manufacturer's manuals.

Tools – Hand:

- Whether provided by the company or the employee, all hand tools must be in safe condition.
- Tools with broken or cracked handles, damaged heads, bent shafts, etc., shall be removed from service.
- All hand tools should be inspected daily by the user, damage to the tools is to be reported to the Foreman.

Ropes, Chains, Slings and Rigging Equipment

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

Management shall determine if this program is required for regulatory compliance within his/her region. Management shall select a training facility or use an in-house qualified trainer to supply and document the training.

Supervisors shall assist the managers in the tasks described above. The supervisor shall verify that each of their employees have the proper training before being involved in rigging operations.

Only qualified and trained personnel can attach or detach lifting equipment to loads or lifting loads.

General:

- Only "qualified riggers" are allowed to attach any loads to a lifting hook and only "qualified operators" are allowed to operate a crane while engaged in lifting operations.

Material Handling:

- Rigging equipment shall be inspected to ensure it is safe prior to use and on each shift and as necessary during its use to ensure that equipment is safe.
- Defective rigging shall be removed from service. Defective equipment shall not be used and removed from service immediately.

- Rigging equipment shall not be loaded beyond its recommended safe working load and load identification shall be attached to the rigging.
- Tag lines shall be used unless their use creates an unsafe condition.
- Latches will be in place on all hooks, eliminating the hook throat opening. Hooks on overhaul ball assemblies, lower load blocks, or other attachment assemblies shall be a type that can be closed and locked, eliminating the hook throat opening. Alternatively, an alloy anchor type shackle with a bolt, nut and retaining pin may be used.
- All ropes, chains, slings, and other rigging equipment shall be inspected daily before it is used.
- Damaged equipment shall be red tagged and taken out of use, not destroyed.
- All hoist chains and wire rope slings are to be inspected annually by a qualified outside agency.
- All ropes which are used as lifelines shall be thoroughly inspected daily.
- Manila rope SHALL NOT BE USED AS LIFELINES!
- Wire rope chokers, chains, and nylon slings should be stored in a clean dry area, out of the sun.
- Slings, chains, and chokers shall have a durable tag affixed stating size, grade, rated capacity, and manufacturer.

Training and Education:

LMM employees shall display their competency in the following topics:

- The selection of proper hardware (eye bolts, shackles, hooks, wire rope products, synthetic slings, chain slings, etc.) for the correct application (weight, hitches, angles, temperatures, center of gravity, etc.).
- The inspection of the selected hardware before, during and after the lift.
- The proper methods of securing the load, attaching the load to the hook, lifting the load, handling of the load during the movement of the load and lowering and placement of load.
- The proper storage of the rigging equipment.
- All LMM employees shall re-certify their training per applicable OSHA, customer, and LMM requirements.
- All LMM employees are trained in risk assessment with rigging material handling. Employees are required to demonstrate their ability to assess the risks associated with rigging equipment along with their understanding of when a piece of equipment is no longer safe for operation.

Forklift Truck Scaffold Platforms

- The platform shall be attached to the forks by enclosed sleeves and shall be secured so that it cannot tip or shift.

- The platform shall have a guardrail on all sides consisting of top rail, midrail, and toeboard, with mesh or panel on the mast side to guard against mast entanglement.
- The platform shall not extend beyond the forks more than 2-feet in any direction.
- A forklift truck with a personnel platform shall not be moved horizontally while the platform is occupied.
- The forklift truck operator shall remain in the truck or within 25 ft of the truck whenever an employee is elevated on the platform.
- The operator must be able to see the elevated employee at all times.
- A wooden pallet shall not be used as a platform.

Ladders

- All ladders will be inspected prior to use.
- Aluminum ladders will not be used around live electrical lines.
- Ladders must extend 3-feet above the landing area.
- No work will be performed on the top step or top of a stepladder.
- All manufacturer labels must be visible.

Electrical Safety

Ground-Fault Circuit Interrupters:

- Whenever possible, all temporary 120 volt, 15-, and 20-amp circuits should be equipped with GFCI type circuit breakers. This type of circuit breaker affords the best possible protection against accidental shock. Where above is not possible, portable GFCI's will be used. GFCI's should be used anytime a lead cord is used.

Lock Out / Tag out Training is mandatory upon employment:

- Each authorized employee shall have the proper number of locks and devices to be able to perform proper lockout/tag out procedures for machines or equipment that they may be working on.
- Lockout or tag out devices shall be affixed to each energy isolating device by authorized employees.
- Lockout and tag out devices shall include name of individual placing device. Devices shall indicate the identity of the employee applying the device.

- Lockout devices shall be affixed in a manner to hold the energy isolating devices in a safe or off position.
- Each energy source shall be locked out completely isolating the equipment.
- Isolating machines or equipment shall include, but are not limited to:
    - Pumps, compressors, generators, electric distribution, storage tanks, etc.
    - Each type of equipment to be isolated shall have specific procedures for isolation, i.e., for compressors: suction, discharge, power, starting, fuel, dumps shall be closed, locked and tagged out properly. The blow-down valve shall be opened, locked and tagged out properly. (NOTE): If compressor has a side stream hooked up, the side stream shall be closed, locked and tagged out properly.
- **Where the work requires exposure to, or handling of, energized conductors or switch gear of 440 volts or more between phases, 2 or more qualified employees shall work together.**

ARC FLASH:

- **All employees to follow all instructions on equipment labeling. If no labeling available,**
    - Employees must be certified in Electrical equipment Operations.
    - Perform arc flash hazard analysis.
    - Gather information to perform proper and accurate calculations.
    - Perform arc flash study and verifications.
    - Follow all proper PPE procedures of Federal and State Regulations.
    - Label equipment properly.

Electrical PPE:

- **General Electrical work**
    - EH footwear.
    - Class E hard hat
    - ANSI Z87 rated safety glasses.
- **Verification of power in addition to above requirements**
    - Class 2 safety equipment
    - FR long sleeve shirt
    - Double layer switching hood.
    - Hearing protection

- **Work on live conductors**
    - Avoid if possible.
    - 40 CAL rated suit
    - Insulated tools

Where the work requires exposure to, or handling of, energized conductors or switch gear of 440 volts or more between phases, 2 or more qualified employees shall work together.

- All live work over 50V will require a written procedure exclusive to the situation which must be completed, prior to the work being performed, by the onsite foreman and authorized by an electrical manager.

Temporary Lighting:

All temporary lighting must be provided in ALL work areas and must be installed in accordance with the National Electrical Code. Temporary lighting must be maintained at the minimum levels in ALL work areas throughout the length of the job.

Electrical Cords:

Electrical cords should be run overhead whenever possible. If not possible, they should be protected from damage. Work should not be performed within 10-feet of energized electrical power lines. This applies to both personnel and equipment. If clearance cannot be maintained, work will not proceed until lines have been de-energized and grounded or other protective measures are in place.

Welding, Cutting, Brazing

Whenever performing “Hot Work” (any work or action that will create excessive heat, spark or flame) the area should be free of hazards such as combustible and flammable substances. Welding blankets or other appropriate protection will be used to protect personnel and property. Where hazards cannot be removed or equipment cannot be protected, work will not take place until appropriate protective measures can be implemented.

A fire watch will be required under the following circumstances:

- Contract Owner requirement.
- In locations where other than a minor fire might develop.
- When combustible materials are within 35 ft of hot work operations or outside 35 ft but easily ignitable.
- Where wall or floor openings could allow sparks to travel to other levels/floors.
- Fire watch is to remain at a minimum of 30 minutes after hot work is performed.

Fire Watch personnel will be trained in the following:

- Proper use and placement (readily accessible) of a fire extinguisher.
- Recognition of fire hazards such as combustible and/or flammable materials and chemicals.
- Plant emergency notification and procedures.
- Only qualified personnel will perform welding, cutting, and brazing operations.
- All welding and burning equipment will be inspected prior to use.
- Hot work permits will be used when required by the Owner or when hazards warrant as determined by a qualified person.
- When hot work operations must be performed in confined spaces, follow the requirements as outlined in the Confined Space Entry section of this manual.
- Any welding, cutting, or burning of products containing lead, cadmium, zinc, mercury, beryllium, or other exotic metals or paints require ventilation or respirators.

Fall Protection

All personnel exposed to fall hazards will be trained to recognize those hazards and take appropriate protective measures. Appropriate training forms will be used.

- 100% Fall Protection is required anytime there is a fall exposure of 6 ft or more.
- Whenever possible, fall hazards will be eliminated through the use of guardrails, perimeter cables, safety nets, or hole covers.
- When the hazard cannot be eliminated, a Personal Fall Arrest System (PFAS) will be used.
- When none of the above is feasible, a Fall Protection Plan will be implemented.
- The Company Safety Manager must approve all Fall Protection Plans.
- Controlled Access Zones (CAZ) and Safety Monitoring Systems are not considered good Fall Protection practice by LMM and will not be allowed.
- Only equipment designed and designated for Fall Protection shall be used.
- Rescue shall be provided for prompt rescue of employees in the event of a fall. Rescue procedures shall be planned and discussed with employee(s) by competent person prior to task being performed.
- Employees must comply with LMM's Fall Protection Policy and Procedures.

Excavations

- Competent Person who is trained in safe excavations shall be present on site.

- Competent person shall conduct daily inspections of excavations, adjacent areas, and protective systems for evidence of a situation that could result in possible cave-ins, failure of protective systems, hazardous atmospheres or other hazardous conditions.
- An inspection shall be conducted by the competent person prior to the start of work and as needed throughout the shift. Inspections shall also be made after every rainstorm or other hazard increasing occurrence. These inspections are only required when the trench will be or is occupied by employees.
- Competent person is responsible for enforcing and adhering to all Federal and State Regulations and LMM and Customer requirements.

Vehicle Operation

Drivers must attend safety meetings as required by the Safety Manager. All drivers shall be trained in general safe operating procedures and in specific safe procedures applicable to their individual vehicles. Drivers are responsible to make sure that all loads are chained, strapped, blocked, or tarped effectively to prevent accidental loss of any part, or all, of the load. Drivers are responsible for complying with all laws, regulations, and traffic controls that apply to the operation of their vehicles.

Accident Reporting:

Any accident or damage to an LMM vehicle, loss of load, injury, damage to property, or other incident involving an LMM on-road vehicle shall be reported to the Safety Manager immediately.

Any accident involving personal injury or property damage shall be reported to the local police, sheriff, or highway patrol immediately.

Disciplinary Action:

Drivers with poor driving records, because of either traffic violations or accidents, are subject to review and possible disciplinary action, including suspension and up to termination, within the DOT requirements and written company policy. Employees and their direct supervisors will be required to sign, date and return a copy of the document related to the driver's offenses to the HR department.

Drug and Alcohol Abuse Policy

The following rules represent the Company's policy concerning substance abuse. These rules will be enforced uniformly with respect to all employees. It is the responsibility of the employee to inform the supervisor of incidental use of prescription or OTC drugs that may impair their on-the-job effectiveness:

1. All employees are prohibited from using, selling, or being under the influence of alcohol or illegal drugs while on duty, or on company premises.

    a. The use of medical or recreational marijuana under State Law will not be an acceptable explanation for a positive drug test.

2. The sale, possession, transfer or purchase of illegal drugs while on duty, on Company property, or while performing Company business is strictly prohibited. Such action will be reported to appropriate law enforcement officials.

3. No alcoholic beverage will be consumed on Company premises, except in connection with Company authorized events.

4. Prescription drugs should only be used by the individual to whom they are prescribed. Such drugs will be used only in the matter, combination, and quantity prescribed. A physician may be consulted to confirm or deny if the effects of your prescription will affect your work performance and/or will create a hazard to yourself or others.

5. No employee shall operate a company vehicle or machinery when their ability to do so safely has been impaired by prescription medication, drugs or alcohol.

6. The purpose of the policies set forth above are as follows:

a. To establish and maintain a safe and healthy working environment for all employees.

b. To ensure the reputation of the Company, and its employees within the community and industry at large.

c. To reduce the number of accidental injuries to personnel and Company property.

d. To reduce absenteeism and improve productivity.

All employees may be subject to a test for drugs and alcohol for the following reasons: after a work-related accident, if the employee has been observed using a prohibited substance on the job, if the employee exhibits a severe and prolonged reduction of productivity, or if the Company has other reasonable cause or observed behavior. Any employee who fails to submit to testing, or tests positive for a controlled substance will be subject to disciplinary action, up to and including suspension or termination.

Crane Safety

Purpose:

The purpose of the Overhead and Gantry Cranes Safety Program is to establish safe work practices and inspection procedures to help ensure that the operators of overhead cranes, as well as LMM employees are protected from potential hazards associated with the movement of equipment and material using an overhead, gantry crane, hoist and related equipment.

This program applies to LMM employees that operate and use overhead cranes, hoists and associated lifting equipment. This program is applicable to all overhead and gantry cranes, including semi-gantry, cantilever gantry, wall cranes, bridge cranes, electric hoists, manual hoists, pneumatic hoists, chains and slings, and other hoisting equipment that have the same fundamental characteristics.

Key Responsibilities

Managers and Supervisors:

- Designate and identify personnel competent to operate cranes, hoists and slings within your area of responsibility a.k.a. competent operators.

- Ensure competent operators have received proper training.
- Ensure cranes, hoists and slings are maintained in proper working order and repaired or replaced when necessary.
- Ensure scheduled inspections and testing is conducted as required.
- Ensure that the requirements of the program are observed, particularly with respect to inspections.
- Establish and maintain an inspection record keeping system for those cranes and hoists within your responsibility. Include the date of inspection, and the signature of the person who performed the inspection.
- Ensure the fitness for duty of crane operators.

Employees:

- Personnel are responsible for visually checking the equipment they are using and reporting any observable wear, needed repairs, or damage to their supervisor. They shall also report all equipment malfunctions immediately.
- Employees are responsible to follow the requirements of this program.

Procedure:

Operating controls shall be plainly marked to indicate the direction of travel.

All manufacturer procedures applicable to the operational functions of equipment, including its use with attachments, must be complied with. Procedures applicable to the operation of the equipment shall always be readily available in the cab and accessible to the Operator. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.

Operator Qualification:

Operators must be determined as qualified before they are permitted to operate any crane. Only those employees qualified by training or experience shall be allowed to operate equipment and machinery. By or on November 10th, 2018, employers must ensure operators are qualified/certified by one of the following methods:

- Certification by an accredited crane operator testing organization.
- Qualification by an audited employer program
- Qualification by the U.S. military
- Licensing by a government entity

Load Chart:

Each hoist must display a legible load chart that indicates the rated capacity in all allowable working positions and configurations. The manufacturer's name, model, serial number, and year of manufacture

or shipment date must be permanently marked on the equipment. This information should be clearly and permanently posted, weatherproofed, and conspicuous on the equipment, ensuring it remains legible at all times. The load chart is to be provided to the equipment operator, who must have it accessible whenever operating the equipment.

Modifying Equipment:

Modifications or additions that may affect the capacity or safe operation of the equipment must not be made without written approval from the manufacturer or approval from a registered professional engineer. The manufacturer must approve all modifications/additions in writing. A registered professional engineer must be qualified with respect to the equipment involved and must ensure the original safety factor of the equipment is not reduced.

Prior to Lifting:

Cranes must not be used unless ground conditions are able to support the equipment and any supporting materials per the manufacturer's specifications. Equipment must not be assembled or used unless ground conditions are firm, drained, and graded to a sufficient extent so that, in conjunction (if necessary) with the use of supporting materials, the equipment manufacturer’s specifications for adequate support and degree of level of the equipment are met.

All loads shall be hooked or slung under the direction of a competent employee.

Prior to operating any equipment, the operator must be familiar with all recent entries in its logbook. The operator must carry proof of training.

Before each shift or prior to an operator using a crane or hoist, an inspection must be conducted for that work shift. Control and safety devices should be tested to detect any defects, malfunctions, or hazardous conditions. All safety devices must be functioning properly before operations begin. Safety devices are required on all equipment and must be in proper working order before starting operations. If any device is not working correctly, the equipment must be taken out of service, and operations cannot resume until the device is repaired. Safety devices may include crane level indicators, boom stops, jib stops, foot pedal brake locks, horns, etc.

A fire extinguisher must be immediately available in the cab of each crane or other hoisting equipment.

Whenever there is a safety concern, the operator has the authority to, and must stop and refuse to handle loads until a qualified person has determined that safety has been assured.

When the operator of a crane or hoist does not have a clear and unobstructed view of the boom, jib, load line, load hook and load throughout the whole range of the hoisting operation, the operator must act only on the directions of a singular, qualified, designated signaler who has a clear view of the things the operator cannot see. The operator of the crane or hoist must stop the operation of the equipment on receiving a stop signal from any person.

Operators of hoisting equipment shall disregard signals from anyone except designated signal persons but in an emergency, other employees may give a stop signal.

Where the design of a crane is such that the boom may fall over backward, positive boom stops shall be installed in accordance with the manufacturer's instructions.

No employee shall ride or be permitted to ride on loads, hooks or similar equipment.

Marking Boundaries

LMM must address safety measures to be used when the equipment has the potential to strike and injure an employee or pinch/crush an employee against any other object. LMM identifies hazard areas by marking the boundaries of the crane swing radius with warning lines, railings or similar barriers. Employees or other persons are not allowed within the barrier when operations are taking place. The crane will immediately be required to stop movement if someone enters the swing radius area.

Overhead Power Lines

A pre-operation hazard assessment will be conducted to identify the work zone and determine if any part of the equipment could reach closer than 20 feet to a power line. The work zone shall be identified by distinguishing boundaries such as flag and range limiting devices or defining the work zone as 360 degrees around the equipment up to the maximum working radius.

LMM will ensure measures must be taken if determined that any part of the equipment, load line or load could get closer than 20 feet to a power line. If it is determined that any part of the equipment, load line or load could get closer than 20 feet to a power line then at least one of the following measures must be taken:

- Ensure the power lines have been deenergized and visibly grounded.
- Ensure no part of the equipment, load line or load gets closer than 20 feet to the power line
- Determine the line's voltage and minimum approach distance permitted in Table A below.

Voltage (Nominal, kV, alternating current)	**Minimum Clearance Distance** (feet)
up to 50	10
over 50 to 200	15
over 200 to 350	20
over 350 to 500	25
over 500 to 750	35
over 750 to 1,000	45
over 1,000	(As established by the utility owner/operator or registered professional engineer who is a qualified person with respect to electrical power transmission and distribution).

Note: The value that follows "to" is up to and includes that value. For example, over 50 to 200 means up to and including 200kV.

Assembling/Disassembling Equipment

The manufacturer's procedures and prohibitions must be complied with when assembling and disassembling equipment.

A competent and qualified person must direct the assembly/disassembly of equipment.

Handling the Load:

Size of Load

The rated capacity of a crane or hoist must not be exceeded, except for rated load testing. The working load shall not be exceeded and shall be determined by the original manufacturer of the equipment, a registered professional engineer, or other persons whose qualifications are acceptable to local regulatory requirements.

New equipment shall also be load tested prior to initial use. Load testing for altered, repaired or modified cranes or hoists may be limited to the functions affected by the alternation, repair or modification, as determined by a qualified person.

- The load shall not be less than 100% of the rated load of the crane or hoist(s), whichever is larger, or more than 125% of the rated load of the crane or hoist, whichever is smaller, unless otherwise recommended by the manufacturer or qualified person.
- During a load test, the person conducting the load test shall prepare a written report of the load sustained during the test and the operations performed during the test. Reports shall be placed on file for that particular crane or hoist(s).
- Operations to perform during a load test include (unless otherwise modified by a qualified person):
    - Hoist the test load a distance to ensure that the load is supported by the crane and held by the hoist brakes.
    - Transport the test load by means of the bridge for the full length of the runway in one direction with the trolley as close to the extreme right-hand end of the crane as practical, and in the other direction with the trolley as close to the extreme left-hand end of the crane as practical.
    - Lower the test load and stop and hold the load with the brakes.
    - Record inspection using H25F_301 Initial Inspection Record, retain originals in equipment file.

Attaching the Load

- The load shall be attached to the hook by means of slings or other suitable and effective means which shall be properly rigged to ensure the safe handling of the load.
- Chain and rope slings shall be free of kinks or twists before use.
- Baskets, tubs, skips or similar containers used for hoisting bulk materials shall be loaded so as not to exceed their safe carrying capacity.
- The hoist rope shall not be wrapped around the load.

- The load shall not be moved without checking the balance and the brakes. Brakes are checked by raising the load a few inches and applying the brakes.

Critical Lift:

- Critical lifts are defined by meeting one or more of the following conditions: (1) the lift exceeds 75 percent of the rated capacity of the crane or derrick, or (2) the lift requires the use of more than one crane or derrick. Anytime these conditions are met, a critical lift plan is required. Additionally, any customer requirements or local regulatory requirements shall also take precedence in regard to Critical Lifts. Use of LMM Critical Lift plan will be documented prior to critical lifts and permits will be required if the following occur:
    - Load exceeds 75% of the crane's rated capacity.
    - Special hoisting/rigging equipment will be used.
    - Two or more cranes/booms will be used.
    - Part of lift is done "blindly" to operator.
    - If cost is over a certain monetary value (customer driven)
    - Lifting over a building.
    - Per customer request.

Load Lifting Manual:

- Safe lifting procedures can be found in the Lifting Handbook located in the operations office as designated for each work site by the Manager.

Safe Lifting:

- If the operator of a lifting device has any doubts as to the safety of employees in the vicinity of the lift, the operator must not move any equipment or load until they are assured that employees and working conditions are safe. He or she shall report the circumstances to his or her supervisor who then shall be responsible for determining the action to be taken.
- Loads will be carried as close to the grade as possible and tag lines shall be rigged as necessary to control swinging of the load.
- Prior to moving a load ensure that the travel path of the load is free and clear of any undesirable obstructions.
- A suspended load shall not be left unattended by any employee.
- Ensure all employees who may be affected by the lift are aware of the hazards and are adequately protected.

- Release the load only after the stability of the load has been verified and loads shall be safely landed and supported before unhooking.

If a hoist or crane is designed to be operated with outriggers or other stabilizing devices LMM shall ensure:

- The outriggers or other stabilizing devices are used in accordance with manufacturers' instructions.
- Are set on a solid footing or pad.
- Have their controls, if any, readily accessible to the operator and in a suitable position for safe operation.
- The area around the outriggers or other stabilizing devices is kept free of obstruction.
- There is a proper minimum clearance between any moving part of the crane and any obstacle near the base of the hoist or crane.
- Where there is a danger of an employee being trapped or crushed by any moving part of the crane when the crane swings, the area around the base of the crane is barricaded to restrict the entry of employees.

Logbook Procedure:

The logbook will be readily available at all times to the operator and to another employee concerned with the maintenance and safe operation of the equipment. The operator shall be responsible for recording defects, operating difficulties, the need for maintenance and all maintenance and alteration work performed. If the operator requests, they shall be given a copy of the logbook.

The logbook for the equipment at a project shall include the greater of the immediately preceding twelve months or the period the crane or similar hoisting device is on the project.

When not being operated, the logbook will be located in the operations office as designated for each work site by the Manager.

All logbook entries shall, on a regular basis, be signed by the person who performs the inspection, maintenance or calibration and review.

- The logbook will include the following information:
- The date and time any work was performed on the hoist.
- Length of time in lifting service, including hours of service.
- All defects and deficiencies and when they were detected.
- Details on all inspections, examinations, calibrations, checks and tests.
- Repairs or modifications performed or maintenance history.
- The record of certification.
- Details on any incident that may affect the safe operation of the equipment.

Inspections:

Each crane and hoist must be inspected and maintained at a frequency and to the extent required to ensure that every component is capable of carrying out its original design function with an adequate margin of safety and is maintained in good working order. Inspections shall also be conducted at regular intervals as recommended by the manufacturer and by law.

Maintenance:

Preventive maintenance shall be performed as prescribed by the manufacturer in the owner's manual. The crane to be repaired shall be run to a location where it will cause the least interference with other cranes and operations in the area. All controllers shall be in the off position. The main or emergency switch shall be open and locked in the open position.

- During maintenance a warning or "out of order" sign shall be placed on the crane, also on the floor beneath or on the hook where visible from the floor.
- After adjustments and repairs have been made, the crane shall not be operated until all guards have been reinstalled, safety devices reactivated, and maintenance equipment removed.
- Any unsafe condition noted during the inspection of the crane shall be repaired before the crane is used.
- Refer to LMM's lockout/tagout safety program before performing maintenance on cranes.

Records of inspection and maintenance must be kept by the equipment operator and other persons inspecting and maintaining the equipment, for the following types of lifting equipment:

- A crane or hoist with a rated capacity of 900kg (2200 lbs.) or more
- A crane or hoist used to support an employee.
- A tower cranes.
- A mobile crane, boom truck or sign truck
- A side boom tractor or pipe layer
- A construction material hoist
- A chimney hoist.

The following inspections shall occur at the indicated frequency:

New Equipment

Before being placed in service, new hoisting equipment, or hoisting equipment which has had modifications in the design or has undergone major repairs, shall be inspected and proof tested under the direction of a competent person who shall give the written warranty of the safe capacity of the equipment.

Functional

Functional inspections shall be conducted at the beginning of each shift, or before the crane is first used during each shift. Items that shall be inspected include:

- Operational controls; hoisting and lowering, trolley travel, bridge travel, limit switches.
- Operational verification of the upper limit device under no-load conditions. The load shall be inched into the limit or run in at a slow speed.
- Deterioration or leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems.
- Ropes, looking for the following removal criteria, and documenting said criteria.
    - Distortion of the rope, such as kinking, crushing, understanding, bird-caging, main strand displacement, or core protrusion.
    - Reduction of rope diameter below nominal diameter due to loss of core support, internal or external corrosion, or wear of outside wires.

General corrosion

- Broken or cut strands.
- Apparent heat damage from any heat source
- Idle ropes are inspected before use.
- Number, distribution, and type of visible broken wires:
    - In running ropes, twelve randomly distributed broken wires in one lay or four broken wires in one strand in one lay. These must be inspected on a monthly basis.
- One outer wire broken at the contact point with the core of the rope, which has worked its way out of the rope structure and protrudes or loops from the rope structure.
- Hoist chains, including end connections, for excessive wear, twist, distorted links interfering with proper functions, or stretch beyond manufacturer's recommendations. These are to be inspected monthly.
- Hooks and latches, looking for the following removal criteria, and are inspected monthly.
- Excessive throat opening
- Damages or missing safety latch
- Wear, deformation, corrosion
- Record the inspection using HS5F_302 Functional Inspection Tag that is affixed to the crane / hoist or made closely available to the crane / hoist.

Daily

A visual inspection of the equipment will be conducted by a competent person prior to each shift. The inspection must consist of observation for apparent deficiencies. Some inspection items shall include control mechanisms, pressurized lines, hooks and latches, wire rope, electrical apparatus, tires (when used), and ground conditions. The manufacturer's guidelines shall be followed.

The following will be tested at the beginning of each shift by the competent operator:

- Limit switches
- Brakes

- Circuit breakers
- Other safety devices

Any defects found during inspection or use of a crane or hoist must be recorded in the inspection and maintenance record system and be reported immediately to the supervisor, who must determine the course of action to be taken. If a defect affects the safe operation of the crane or hoist, the equipment must not be used until the defect has been remedied.

Monthly

LMM will ensure monthly inspections of equipment by a competent person are documented. Equipment must be inspected monthly by a competent person. The manufacturer's guidelines shall be followed. The inspection must be documented. Documentation must include the following:

- Items checked
- Results of inspection
- Name and signature of the inspector

Documentation must be retained for 3 months. (Documented monthly inspection is not required if the daily inspection is documented and records are retained for 3 months).

Any defects must be corrected before the crane is used. The report must be dated and signed by the person performing the inspection.

Yearly

Once each year a more detailed inspection must be made of all hoisting equipment at each facility. After completing the annual inspection, a report must be completed and signed by the person performing the inspection and the report will be returned promptly to the Safety Manager.

Rigging

All rigging work shall be assembled, used, maintained and dismantled under the direct supervision of a competent and qualified employee trained in safe rigging practices. These activities should adhere to the manufacturer's specifications and with the code of signals authorized by local regulatory guidelines for controlling hoisting operations.

Rigging Breaking Strength and Load Rating:

The safe working load on ropes, chains, slings and fittings shall not exceed the safe working load recommended by the manufacturer. The safe working load must be clearly marked on a crane.

Rigging fittings must be marked with the manufacturer's identification, product identifier and the working load limit (WLL) or sufficient information to readily determine the WLL. The WLL of existing fittings not identified must be determined by a qualified person, marked on the fitting and such fittings must be removed from service.

LMM may use a dedicated rigging assembly designed and certified for a particular lift or project by a professional engineer, but the dedicated rigging assembly must be re-rated before it is used for another lift or project.

The maximum load rating of the rigging, as determined by the rigging manufacturer or a professional engineer must be legibly and conspicuously marked on the rigging. If it is not practicable to mark the rigging the maximum load rating of the rigging must be available to the employees at the work site.

Rigging Inspection and Rejection Criteria:

All LMM rigging and rigging equipment to be used during a work shift is to be inspected thoroughly prior to each period of continuous use during the shift to ensure the rigging is functional and safe by a competent person. All deteriorated or defective equipment will be immediately removed from service if it doesn't meet the inspection requirements or rejection criteria below:

Slings

- A wire rope sling with a swaged or poured socket or a pressed fitting must be permanently identified with its working load limit, the angle upon which the WLL is based and the name or mark of the sling manufacturer.
- An alloy steel chain sling must be permanently identified with the size, the manufacturer's grade and the WLL, the length and number of legs, and the name or mark of the sling manufacturer.
- Synthetic fiber web slings must be permanently identified with the manufacturer's name or mark, manufacturer's code or stock number, working load limits for the types of hitches permitted, and type of synthetic web material or be removed from service if any of these requirements are not met.
- A sling shall be permanently removed from service if it is damaged or worn.
- All slings are to be clearly labeled to indicate the slings maximum load or the slings maximum load is made readily available to employees.
- A sling must be stored to prevent damage when not in use.
- When a sling is applied to a sharp edge of a load, the edge or the sling must be protected to prevent damage to the sling.

The following procedures will be followed when using slings:

- Slings damaged or defective will be removed from service.
- Slings will not be shortened with knots or bolts or other makeshift devices.
- Sling legs will not be kinked.
- Slings will not be loaded beyond their rated capacity.
- Slings used in a basket will have the loads balanced to prevent slippage.
- Slings will be securely attached to their loads.
- Slings will be padded or protected from the sharp edges of loads.
- Suspended loads will be kept clear of obstructions.

- All employees will be kept clear of loads about to be lifted and of suspended loads.
- Hands or fingers shall be kept clear of loads and not placed between the load and the strap.
- Shock loading shall not be allowed.
- Slings will not be removed while loads are resting on the sling.

Hooks

- A worn or damaged hook must be permanently removed from service. LMM shall not require or permit an employee to use a hook that is worn, damaged, deformed, cracked or otherwise defective. This includes hooks where the throat opening has been increased or the tip has been bent more than 10% out of plane from the hook body, or any dimension of the hook has been decreased by 10%, or any damage exceeds any criteria specified by the manufacturer. **Note**: This is a higher standard than required in some locations.
- All hooks shall be clearly labeled with the maximum load of the hook in a location where an employee using the hook can easily see the rating or the hooks maximum load is made readily available to employees.
- A hook will have a safety latch, mousing or shackle if the hook could cause injury if it is dislodged while in use.

All devices shall be visually inspected prior to use and removed from service for any of the following conditions:

- Nylon slings with:
    - Abnormal wear.
    - Torn stitching.
    - Broken or cut fibers.
    - Discoloration or deterioration.
- Wire rope slings with:
    - Kinking, crushing, bird caging, or other distortions.
    - Evidence of heat damage.
    - Cracks, deformation, or worn end attachments.
    - Hooks opened more than 10% at the throat.
    - Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.
- Alloy steel chain slings with:
    - Cracked, bent, or elongated links or components.

- Cracked hooks.
- Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

Operational Procedures:

- Rigging shall not be subjected to loads more than outlined in legislative requirements. LMM will ensure the maximum load rating of the rigging is available to the employees at the work site.
- Wire rope, alloy steel chain, synthetic fiber rope, metal mesh slings, and synthetic fiber slings shall meet the requirements of ASME Standard B30.9-2021, Safety Standard for Cableways, Cranes, Derricks, Hoists, Hooks, Jacks and Slings (or current version). Below-the-hook lifting devices, other than slings shall meet the requirements of ASME Standard B30.20-2021, Below the Hook Lifting Devices (or current version).
- Loads to be unhooked by an employee must be safely landed and supported before the rigging is detached.
- The determination of the working load limit (WLL) of a sling assembly must ensure that the WLL of any individual component of the assembly is not exceeded.
- All slings used to hoist a load and the slings fittings and attachments must be in compliance with legislated standards and capable of supporting at least 10 times the load to which the slings fittings, and attachments may be subjected where they are used to support an employee, and at least five times the maximum load to which they may be subjected in any other case.
- No shackles shall be subjected to a load greater than the maximum load indicated on the shackle, and all shackle pins are installed to prevent accidental withdrawal, and a bolt is never used in the place of a properly fitted shackle pin.
- All hooks shall have a safety latch, mousing, or shackle if the hook could cause injury if it is dislodged while in use.
- Where an employee may be endangered by the rotation or motion of a load during hoisting one or more tag lines must be used to control the rotation or motion of the load and the tag lines will be of sufficient length to protect the employees from any overhead hazard and the tag lines are not removed from the load until the load is securely landed.

Rigging a Load:

- Determine the weight of the load - do not guess.
- Determine the proper size for slings and components.
- Do not use manila rope for rigging.
- Ensure that shackle pins and shouldered eyebolts are installed in accordance with the manufacturer's recommendations.

- Ensure that ordinary (shoulder less) eyebolts are threaded in at least 1.5 times the bolt diameter.
- Use safety hoist rings (swivel eyes) as a preferred substitute for eye bolts wherever possible.
- Pad sharp edges to protect slings.
- Remember that machinery foundations or angle-iron edges may not feel sharp to the touch but could cut into rigging when under several tons of load.
- Wood, tire rubber, or other pliable materials may be suitable for padding.
- Do not use slings, eyebolts, shackles, or hooks that have been cut, welded, or brazed.
- Install wire-rope clips with the base only on the live end and the U-bolt only on the dead end.
- Follow the manufacturer's recommendations for the spacing for each specific wire size.
- Determine the center of gravity and balance the load before moving it.
- Initially lift the load only a few inches to test the rigging and balance.

Signaling:

- Operators should be instructed to take signals from only one person.
- Make sure that the signal person knows all the standard signals and they are posted on all of the cranes.
- Telephone or radio signaling for “blind” lifts requires that the operator and the signal person discuss and practice their signals prior to any lifting.
- Nextel’s or similar radios shall **not** be used for equipment signaling due to the one and one-half second transmission delay.
- All signal persons must wear a high visibility vest.

A signal person must be provided if the operator's view is obstructed, if site specific safety concerns require it, or if the operator determines that it is necessary. A signal person must be provided for the following situations:

- The point of operation is not in full view of the operator
- The view is obstructed when the equipment is traveling
- The operator or the person handling the load determines it is necessary due to site specific concerns

Signals to the operator shall be in accordance with OSHA Appendix A to Subpart CC of Part 1926. Specific requirements include:

- Each movement of equipment shall be proceeded by distinctive signals clearly discernible to all employees endangered by the movement and clearly distinguishable by the operator of the

equipment controlled, and a signal which is not understood clearly by the operator of equipment shall be acted upon by him or her as though it were a stop signal.

- An employee shall not cause a signal to be given for the movement of equipment unless they have verified that they and all employees within their designated area are not endangered by the movement.
- Only a designated employee shall cause a signal to be given for the movement of equipment, but employees may cause a stop signal to be given and this signal shall be obeyed promptly and without question.
- An employee designated to direct the movement of equipment shall not be otherwise occupied while the equipment is in motion and they shall be prepared to signal to stop during the motion.
- A signaling device that functions unreliably or in a way that might constitute a hazard to an employee shall be removed from service immediately.
- Signals shall be discernible or audible at all times.
- Some special operations may require addition to or modification of the basic signals

Concrete and Masonry

Reinforcing Steel (Resteel):

- Any employee who is placing or tying resteel more than 6-feet above adjacent surfaces must use fall protection.
- Access across resteel for general traffic shall be by constructed walkway.
- No employee shall be permitted to work above vertically protruding resteel, unless it has been guarded to protect against impalement.
- Vertical resteel for walls, piers, columns, etc., shall be braced and guyed against collapse.
- Resteel shall not be used for any part of a scaffold, nor as a lifting device.
- Resteel shall not be welded.
- Rolled mesh shall be secured against recoil. Unguarded spear ends shall be clipped to the nearest joint.
- All vertical rebar-steel must be capped by approved OSHA standards.

Forming:

- Formwork shall be designed, erected, supported, and braced to be able to bear vertical and lateral loads during placement and curing of concrete.

- Drawings for shored formwork that show jack layout, shores, work decks, and scaffolds shall be available at the jobsite.
- Any employee who does formwork 6-feet or more above the ground or floor shall wear and use a safety harness and lanyard to provide 100% tie off requirement.
- A tag line shall be used to control large form panels and sections.
- Built up form sections shall have lifting attachments that are capable of supporting the load.
- Forms shall not be removed until the concrete can hold its designed load.
- When removed, the stripped forms shall be immediately cleaned of protruding nails.

Shoring:

- Shoring sills shall be sound, rigid, and capable of bearing the maximum load.
- When shoring from soil, care must be taken to see that the soil is capable of bearing the load.
- Soil shall be inspected after each load-bearing occurrence to see that it can still sustain the load.
- Vertical shores shall be plumb and braced laterally to give stability during erection and concrete placement.
- Shoring equipment shall be inspected by a qualified person before erection and before, during, and after concrete placement.
- If, after any of these inspections, the shoring is found to be defective, the forms shall be reshored.
- Only designated employees shall be permitted immediately under the forms during concrete placement.
- Shoring shall not be released, and loads shall not be superimposed, unless a qualified person indicates that the concrete has developed sufficient strength (at least 70% of designed strength).
- Single-post shores shall be braced horizontally in both longitude and transverse directions.
- Defective timbers or heavily rusted members shall not be used.
- Setting nails shall be driven home, with points bent over, if possible.

Concrete Placement:

- A concrete mixer with a one-yard or larger skip shall have a mechanical clearing device, and a guardrail capable of withstanding a 200-pound thrust on both sides.
- The handles of concrete buggies (scoot cretes) shall not extend beyond the wheels on either side.

- Concrete buckets shall have positive latches to prevent accidental discharge and shall be lifted by means of a swivel-type hook. No employee shall be permitted to ride on them, or to work under them.
- When the point of placement is not visible to the crane operator, a signaler shall be used. If this is not possible, radio or telephone communications must be used.
- Nextel's or similar radios shall not be used for equipment signaling due to the one and one-half second transmission delay.
- Pumping systems shall have supports that are designed for a 100% overload.
- Air hose connections shall be positively secured to prevent accidental breakaway.
- Employees involved in green cutting, sand blasting, and concrete pumping shall wear head, face, and eye protection.
- Vibrator motors shall be properly grounded and shall be protected against coming into contact with wet concrete.
- Bull floats used near possible electrical contact shall have handles that are non-conductive.
- Concrete troweling machines shall be equipped with switches that automatically shut off when the handle is released.

Precast:

- The lifting attachments for precast shall have a design safety factor of five.
- Reinforcing steel shall not be used as a lifting device.
- Precast members shall be properly braced against shifting or collapse.
- No employee shall be permitted to work under a precast member during a lifting operation.
- A bracing plan must be submitted to appropriate Safety Committee or Person prior to working under or around pre-cast member.

Silica:

There are many forms of natural silica of which crystalline quartz as respirable dust is of concern. The problem with silica as dust is that it stays airborne for a long time and creates an inhalation hazard especially near its source. Silica health effects include silicosis which is a serious and sometimes fatal disease. The higher the concentration and the longer the exposure, the greater the risk of developing silicosis. Silicosis occurs among workers in the construction, primary metals, stone, concrete, transportation, mining and other industries.

In construction, the cutting of concrete either as pipe or slab and abrasive blasting can release large amounts of silica into the air where clouds of dust typically form. Always try to use wet cutting methods when possible to control the dust. If a cloud of dust appears, never walk or stand in it without respiratory protection. Avoid enclosed areas where this type of work is performed. Supplied air helmets

may be necessary for abrasive blasting. Any worker creating or exposed to silica dust must be trained on the hazards and a respiratory program is required.

The highest silica dust exposure occurs when exposed to concrete related activities including:

- Sawing
- Grinding
- Abrasive blasting
- Drilling
- Breaking
- Sweeping
- Chipping
- Jack Hammering
- Shoveling

Respirators shall not to be used as primary means of preventing or minimizing exposures to airborne silica contaminants. Engineering or administrative controls such as substitution, automation, enclosed systems, local exhaust ventilation, wet methods, and good work practices shall be used whenever possible. Source measures should be the primary means of protecting workers. When these methods cannot keep exposures below the NIOSH REL, controls should be supplemented with the use of respirators.

When respirators are used, the employer must establish a comprehensive respiratory protection program, as outlined in the NIOSH Guide to Industrial Respiratory Protection [NIOSH 1987a] and as required in the OSHA respiratory protection standard [29 CFR 1910.134 and 1926.103]. Important elements of this standard include:

- Air monitoring
- Initial and annual training of personnel
- Selection of respirators and limitations
- Importance, testing and recognition of a tight fit
- An evaluation of the worker's ability to perform simulated tasks while wearing a respirator
- Respirator fit testing
- Maintenance, inspection, cleaning, disinfection and storage of respirator equipment
- An evaluation of the program and adjustments made, as needed.

Confined Space

Definitions:

- **Attendant** is an individual stationed outside one or more permit spaces who assess the status of authorized entrants and who performed the duties as specified in 1926.1203.
- **Confined Space** a space that meets all of the following criteria:
    - Is large enough and so configured that an employee can bodily enter it.
    - Has limited or restricted means of entry or exit.
    - Is not designed for continuous employee occupancy.
- **Entry** the action by which a person passes though an opening into a permit-required confined space. Entry includes ensuing work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.
- **Hazardous atmosphere** an atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue, injury, or acute illness from one or more of the following causes:
    - Flammable gas, vapor, or mist in excess of 10% of its lower flammable limit (LFL).
    - Airborne combustible dust at a concentration that meets or exceeds its lower flammable limits (LFL).
    - Atmospheric oxygen concentration below 19.5% or above 23.5%;
    - Atmospheric concentration of any substance for which a dose or permissible exposure limit (PEL) is 29 CFR 1926, Subpart D, Occupational Health and Environmental Control, or in Subpart Z, Toxic and Hazardous Substances, and which could result in employee exposure in excess of its dose or PEL.
    - Any other atmospheric condition that is immediately dangerous to life or health (IDLH).
- **Immediately dangerous to life of health (IDLH)** any condition that would interfere with an individual's ability to escape unaided from a permit space and that poses a threat to life or that would cause irreversible adverse health effects.
- **Non-permit space** a confined space that meets the definition of a confined space but does not meet the requirements for a permit-required confined space.
- **Permit-required space** means a confined space that has one or more of the following characteristics:
    - Contains or has a potential to contain a hazardous atmosphere.
    - Contains a material that has the potential for engulfing an entrant.
    - Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls by a floor which slopes downward and tapers to a smaller cross section.
    - Contains any other recognized serious safety or health hazard.

Signs:

Either a danger sign or other effective means will be used to inform all employees of spaces that are classified as confined spaces. Other effective means can include initial training of all employees and semi- annual refresher training. Where signs are used, the sign will read:

DANGER-PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER

Other similar language may be used.

Alternate procedure:
LMM may use an alternate procedure when entering a permit space if the following conditions are met:

- All the physical hazards in the space are eliminated or isolated through engineering controls so the only hazard posed in the space is an actual or potential hazardous atmosphere.
- Forced air ventilation alone is sufficient to maintain the permit space safe for entry.
- Forced air ventilation is sufficient to maintain the permit space safe for entry, and that in the event the ventilation system stops working, entrants can exit the space safely.
- Monitoring and inspection data supports items 1 and 2 above.
- When entrance covers are removed, the opening is immediately guarded by a railing, temporary cover or other temporary barrier that would prevent an accident fall through the opening.

Reclassifying a confined space:
A space classified as a permit-required confined space, may be reclassified as a non-permit confined space when a competent person determines the requirements below are met:

- The permit space poses no actual or potential atmospheric hazards and if all the hazards within the space are eliminated or isolated.
- The hazards of the space are eliminated or isolated, unless it can be demonstrated that is infeasible.
- All the hazards in the space have been eliminated or isolated, through certification that contains the date, the location of the space and the signature of the person making the determination.
- If hazards arise within a permit space that has been reclassified as non-permit space, then each employee shall exit the confined space, and the space will be reevaluated by the competent person.

Employer responsibilities:

- Evaluate the hazards of the permit space prior to entry.
- Develop and implement the means, procedures and practices necessary for safe permit space entry operations.
- Provide the necessary equipment at no cost to each employee and maintain the equipment properly, and ensure that each employee uses the equipment properly.

- Evaluate the permit space by testing, monitoring and providing an early warning system that continuously monitors for non-isolated engulfment hazards.
- Provide at least one attendant outside the permit space into which entry is authorized.
- Develop and implement procedures for summoning rescue and emergency procedures.
- Review the permit system, using the canceled permits within one year after each entry and revise the program as necessary.

Entry permit:
The entry permit will identify the following:

- Identify the space to be entered.
- The purpose of the entry.
- The date and the duration of the entry permit.
- The authorized entrants.
- Means of detecting an increase in atmospheric hazard levels in the event the ventilation system stops working.
- Name of each attendant.
- Name of the entry supervisor
- The hazards of the permit space to be entered.
- The measures to be used to control the hazards present in the permit space.
- Rescue procedures.
- Personal protective equipment, testing equipment, communication equipment, alarm systems and rescue equipment to be provided.
- Any other information necessary to ensure employee safety.

Training:
Training will include and be provided when:

- Training will be in a language and vocabulary that the employee can understand.
- Provided prior to a worker first being assigned duties under the Standard.
- There is a change in the assigned duties.
- When there is a change in permit space entry operations that present a hazard about which the employee has not previously been trained.

- Whenever there is any evidence of a deviation from the permit space entry permit space entry procedures as required by 29 CFR 1926.1204 (c) or there are inadequacies in the employee's knowledge or use of these procedures.

- The training will establish employee proficiency in the duties required by the Standard and will introduce new or revised procedures, as necessary for compliance with the Standard.

- Training records will contain the employee's name, the name of the trainer and the date of the training.

Duties of the entrant:

- Use equipment as required by 29 CFR 1926.1204(d).
- Communicate with the attendant as necessary.
- Alert the attendant if there are any warning signs or symptoms of exposure to a dangerous situation or a prohibited condition.
- Exit the permit space as quickly as possible when notified by the attendant to evacuate, notified by the entry supervisor to evacuate, the entrant notices a prohibited condition, or an evacuation alarm is activated.

Duties of the attendant:

- Understands the hazards that may be encountered during entry.
- Is aware of possible behavioral effects of hazard exposure in authorized entrants.
- Continuously maintains an accurate count of authorized entrants in the permit space.
- Remains outside of the permit space during entry operations until relieved by another attendant.
- Communicates with authorized entrants as necessary.
- Assess activities and conditions inside and outside of the permit space to determine if it is safe for entrants to remain in the space.
- Orders an evacuation of a permit space if a prohibited condition occurs, behavioral effects of hazard exposure are apparent in authorized entrant(s), a situation outside of the space could endanger the entrants, or if the attendant cannot effectively or safely perform their duties.
- Summons rescue and other emergency services as soon as the attendant determines that authorized entrants may need assistance to escape the permit space.

- Perform non-entry rescue as specified by the rescue procedure.
- Performs no duties that might interfere with the attendant's primary duty to assess and protect the authorized entrants.

Duties of the entry supervisor:

- Is familiar with and understands the hazards that may be faced during entry, including information on the mode, signs or symptoms and consequences of the exposure.
- Verifies, by checking that the appropriate entries have been made on the permit, that all tests specified by the permit have been conducted and that all procedures and equipment specified by the permit are in place before endorsing the permit and allowing entry to begin.
- Terminates the entry and cancels or suspends the permit as required by § 1926.1205(e);
- Verifies that rescue services are available
- Removes unauthorized individuals who enter or who attempt to enter the permit space during entry operations.
- Determines, whenever responsibility for a permit space entry operation is transferred, and at intervals dictated by the hazards and operations performed within the space, that entry operations remain consistent with terms of the entry permit and that acceptable entry conditions are maintained.

Rescue and emergency services:
Rescue teams or services will:

- Be capable to reach victim(s) within a time frame that is appropriate for the permit space hazard(s) identified.
- Is equipped for and proficient in the needed rescue services.
- Have access to all permit spaces where rescue or emergency services may be required.
- Each rescue employee will be trained in basic first aid and cardiopulmonary resuscitation (CPR).
- Rescue equipment will be onsite and in good working condition prior to entry into the permit space.

Section 3: Emergency Preparedness

Policy

It is the policy of LMM that all projects will develop procedures to deal with unforeseen events. This plan or group of plans must be adapted to each particular job and geographic location. Emergency action plans shall be developed prior to work beginning.

It is not possible to develop detailed plans for every type of emergency that may occur. However, we can prepare basic plans which, coupled with common sense, will fit most of the circumstances we are involved with, and provide the best response in an emergency.

It is very important that all our employees be instructed and understand the procedures that they are to follow during an emergency.

First Aid & CPR

All job sites will have at least one person who is trained in First Aid. That person should be available when work is in progress to render first aid to injured employees until outside medical aid arrives. First aid supplies sufficient for the type of work and the number of people on the project shall be maintained at all times. First aid kits are located in each foreman's toolbox, and extras are available with the safety manager should they be needed. Supplies are to be checked before being sent to the job and weekly thereafter. First Aid Kits shall conform to ANSI class and type based on requirements.

All employees shall be trained in how to summon emergency medical assistance and what to do until it arrives. On Projects with special hazards, special instruction will be provided.

Examples include but are not limited to:

- Eye wash and shower stations, location(s) of emergency phones, etc.
- Arrangements for transportation of injured persons shall be made and be available during all hours of work.
- NO injured person is to transport him or herself to get medical assistance, unless they are by themselves.
- Every Project shall make arrangements with a local doctor, clinic, and/or hospital for the treatment of any injured employees. These arrangements are the responsibility of the Project Manager and should be made prior to the job beginning in order to minimize delays in patient treatment.
- A list of emergency telephone numbers shall be prepared. The list should include numbers for the ambulance, hospital, local doctor, fire department, and police. This list shall be posted in a conspicuous place near the telephone.
- The use of the emergency action/response information poster, when filled out and properly posted, will fulfill this requirement.

A procedure should be developed, and personnel trained to minimize time between the injury and the time the ambulance attendants reach the victim (such as: having someone meet and direct the

ambulance). Make a few people available to help the ambulance crew if needed. In most cases, the injured person should be allowed to notify their family themselves.

Housekeeping and Accident Clean-Up

Housekeeping/ Accident Clean-Up - Follow "Blood Borne Pathogens" (universal precautions):

- Housekeeping precautions are to be used to avoid contact with blood.
- They will take contaminated materials with them for proper disposal. If this is not possible, contact the safety manager for proper disposal directions.
- Disposal of contaminated universal precautions equipment.
- Decontamination of contaminated surfaces.
- Drug Screening Personnel.
- All equipment, environmental and working surfaces contaminated with blood or OPIM shall be cleaned ASAP or disposed of.
- A disinfectant shall be used.
- Only employees covered under the bloodborne pathogen program will conduct the clean-up.
- Universal precaution equipment shall be used during clean up.
- Cleaning waste solids shall be disposed of as discussed above.
- Liquid waste shall be disposed of via a sanitary sewer.
- Document all information on exposures.
- Maintain contact with consulting health care professionals and ensure all necessary follow-up is completed.

Fire

- Evacuation meeting area is to be determined or established prior to each project.
- In the event of a fire, the first priority is to notify the Plant fire/security of the exact location and nature of the fire.
- While waiting for assistance, trained workers may attempt to fight the fire with fire extinguishers and fire hoses. However, no persons are to be endangered.
- The project's management team should evaluate the situation and, if necessary, start an orderly evacuation of the job. Have the craft foreman assemble away from the building area and account for all of our people.
- As a plant fire/security personnel arrive, project management should report to the management person from the plant. Inform them of the pertinent facts, such as:
    - The type and specific location of the fire.

    - Whether or not all employees have been evacuated.
- Project management should remain available to provide further information if requested.
- The project office should notify the safety manager as soon as practical.

Structural Collapse/Severe Weather

These types of emergencies require the exercise of judgment by project management and supervision. It is likely that some or all of the steps outlined for injury or fire may be applicable. The safety manager will respond and assist as soon as notified.

In the event of structural collapse or equipment failure, notify the Facilities Manager immediately. They will provide any necessary assistance.

Severe Weather - Preventative Measures

Severe weather of various types may occur at any of our job locations throughout the year. Preventative measures can and should be taken to avoid injury or property damage when severe weather strikes.

- Monitor severe weather forecasts daily - be alert for tornado watches and other severe weather warnings.
- Be sure that material stockpiles, scrap, decking, plywood, or other items which could be moved by high winds, are secured: especially on upper floors, roofs, and open areas.
- When working outdoors and lightning and/or high winds are imminent, curtail hoisting activities and any other work in which an employee may be exposed to these dangers.
- When tornado watches are in effect, inform all employees and prepare for an orderly shutdown and evacuation in the event that an actual tornado warning is sounded.
- Snow and ice cause slips and falls and adds tremendous amounts of weight to any load. Be prepared to deal with ice and snow as a job hazard.
- Shelters and evacuation areas will be identified as per project.
- Storm shelters and evacuation areas shall be identified as such.

Section 4: Protection of the Project and Public

Policy

It is the policy of LMM that every project should develop a "Security Program" suited to its particular needs. A security program should be designed to protect the interests of the owner, all contractors, and employees from losses due to theft, vandalism, and any other outside interferences, whether accidental or intentional. It must also be designed to keep the general public out of the jobsite and away from the hazards of any construction activity.

Fences and Barricades

Wherever possible, job sites should be fenced or barricaded off around their entire perimeter, especially when our work puts us in proximity to non-construction personnel, such as in an operating plant. The

barricades or fencing should be of sufficient size and durability to keep ALL unauthorized people away from the work area.

Environmental Protection

Damage to the environment is very costly, both in clean-up requirements and fines. Projects must control all items that could adversely affect the natural surroundings.

- Fuels, oils, solvents, and other chemicals used in the construction process must be contained properly.
- Spills of any kind must be cleaned up.
- Spend chemicals and their containers must be disposed of properly.
- If there is a chemical spill at one of our job sites for which we are the responsible party, the corporate safety manager is to be contacted immediately for assistance.

In the event of a chemical spill, the employee(s) involved will perform the following:

- The employee(s) will identify the existence of the spill.
- The employee(s) will inform their immediate supervision who in-turn will notify the appropriate on-site authorities.
- LMM's hazardous spill containment kit will be located and moved to the vicinity of the spill.
- In accordance with SDS requirements, the spill will be contained, storm drains will be covered, and the spill will be absorbed.
- The absorbed material will be cleaned up and put into the spill containment kit barrel for proper disposal.
- LMM will arrange for the hazardous material to (1) be removed from site by an authorized hazardous waste hauler, or (2) be taken to customer's hazardous waste location at their direction.
- Document actions taken for follow-up report requirements.

Section 5: Reports and Recordkeeping

Policy

It is the policy of LMM that all injuries, accidents, damage claims, and potentially serious accidents must be reported to the safety manager immediately after the occurrence. It is the responsibility of the project manager to ensure that these procedures are followed, and reports made in a timely manner.

Injury Reporting

Crisis Management Team Procedure

For any injury or illness incident to any LMM employee or other persons (subcontractors, service providers) working under LMM, the senior most LMM representative immediately available on-site will handle the initial assessment and response. This could be a LMM Safety Professional (if present) or other

management representative, such as the Safety Representative, Project Manager, or Superintendent. The LMM site leadership representative will be responsible for:

• Ensure all employees are out of harm's way.

• Call 911 immediately for ambulance/EMT if warranted.

• Administer first aid as appropriate using the designated first aid/CPR provider or another qualified individual.

• Gathers information to ensure no additional hazards (what did you cut hand on, was anyone else involved, et al)

• Give prompt phone or text notification to LMM safety leadership. If the injured or ill individual is not employed by a LMM, also promptly notify, and engage the employer's safety or management representatives.

• If care or diagnosis is necessary beyond first aid but an ambulance is not needed, the individual will be transported to the pre- arranged clinic. The transportation should be done by Safety Professional or other supervisory personnel of LMM or the employer. Do not let the sick or injured individual transport themselves.

• Once the individual is en route to the clinic or hospital, provide prompt phone or text notification to the LMM Holdings Risk Management Workers' Compensation Specialist.

The Safety Manager will immediately notify LMM CEO. This communication will immediately kick off the LMM Crisis Management Team response.

Incident Site Leadership continues active role in incident, care, and or follow up. Whether directly or indirectly, LMM is committed to ensure affected employee feels that they are part of the LMM team and that they know LMM is doing everything possible to get them back to work/livelihood.

Our Commitment:

Lee Machinery Movers is fully committed to each member of our team to ensure their health and safety is our #1 priority! We strive to always keep our employees safe. When an accident occurs at work, our Return to Work team is responsible for ensuring that the injured employee resumes their full job duties safely and promptly. This is achieved through teamwork and regular monitoring of each participating employee's progress.

Our Team includes, but is not limited to, the Safety Manager, Operations Manager, Human Resources Manager, and the Injured Team Member.

We pride ourselves on ensuring the employee and their family members feel we are working together as a team to get them back to work safely, while also ensuring that they fully recover from the incident.

CEO's Commitment:

- Shall work with the Crisis Management team to communicate and reaffirm LMM's commitment to our employees and Safety.

Safety Manager's Commitment:

- Shall notify the CEO immediately after an incident has occurred.
- Shall notify the Operations Manager and Human Resources Manager as soon as feasible after an incident has occurred to kick off the Crisis Management Team response.
- Facilitate communication with Account Manager and Operations Manager to keep customer updated and/or aware of status updates.
- Assist site superintendent/on-site leadership, whether verbally or physically, in ensuring the employee is treated by the correct medical facility, following LMM procedures.
- Depending on severity of injury, will assist with stopping the job, getting employees out of harm's way, coordinate employee being taken to healthcare facility, and gathering all other necessary information.
- Shall gather information from on-site leadership, supervisor, operations manager, injured employee, and any witness statements, as required in the Incident Investigation Report.
- Will reach out to injured worker either face to face, or by phone, to ensure they know we are taking this seriously, and will work with our Crisis team to get them the medical treatment they deserve and need and return to work as safely and prompt as possible.
- Shall drive constant communication within the Crisis Management team including setting up daily/weekly/monthly meetings to ensure everything is being done to mitigate the days away from work, if any, and keep the team on the same page.
- Maintain an attitude that creates a workplace that the injured team member wants to return to.

Operations Manager's Commitment:

- Shall demonstrate through daily positive actions and knowledge, his or her support and compliance with LMM's health and safety policy, including the return-to-work program.
- Assist in facilitating immediate medical treatment for the injured team member as necessary and in accordance with Lee Machinery Movers' policy (use affiliated/network healthcare providers whenever possible)
- Notify the team member's family (emergency contact), ensure they feel confident that we are doing everything in our power to help the injured employee recover fully and return to work as soon as they are able.
- Continue to assist in progress updates to the injured worker and family, as necessary and appropriate.

- Assist with providing proper documentation to the Safety Manager to input into the Incident Investigation Report in a timely manner, if applicable.
- Maintain an attitude that creates a workplace that the injured team member wants to return to.
- Demonstrate support and encouragement for team members off work for an extended period – this may be done by maintaining weekly contact, such as a phone call, when appropriate.

When team member is returned to temporary transitional duty (light duty), Ops Manager, alongside supervisor and Safety Manager will:

- Welcome back the team member and explain to him/her the duties associated with the temporary transitional position.
- Discuss the details of the temporary transitional agreement with the team members. The transitional return to work agreement will be prepared by the Human Resources Manager.
- Ensure the employee has all the required materials so they are successful in their light duty work.
- Communicate the team members' restrictions to the staff that is impacted by this position.
- Communicate with the Human Resources Manager regularly on the team member's progress with transitional duties.
- Ensure restrictions are being followed and accommodation is made in a timely fashion, as necessary.
- Notify HR manager of any potential workers' compensation fraud.

Human Resources Manager Commitment:

- Shall act as Lee Machinery Movers' liaison for all injuries and illnesses.
- Coordinate the temporary transitional return to work program by consulting with the Operations Manager, Safety Manager, and onsite supervisor.
- Remain in constant contact with LMM's Safety Manager, Operations Manager, healthcare provider, and insurance company. Provide regular updates to the Crisis Management team.
- Obtain and coordinate all paperwork associated with the injured team member including documentation of medical care provider visits, OSHA injury and illness log, return-to-work restrictions.
- May request the claimant's medical status, a medical re-evaluation, and an independent medical examination.
- Work with the Operations Manager, Safety Manager and onsite supervisor to identify a temporary transitional job when the team member has received restrictions from healthcare provider. An offer will be made in writing by HR Manager to the injured team member. This letter will include a description of duties to be performed and reflect the doctors' restrictions.

- If the injured team member refuses to accept a return-to-work offer, notify the insurance company immediately.
- If the injured team member accepts a return-to-work offer, notify the insurance company immediately.
- Shall contact the insurance company immediately if fraud is suspected on the part of the team member or healthcare provider.

Injured Team Members' Commitment:

- Shall notify supervisor immediately after an incident has occurred.
- Seek appropriate medical treatment, with supervisor or Safety Managers' assistance.
- Provide information to the supervisor to be documented in the Incident Investigation Report.
- Adhere to drug and alcohol testing requirements.
- Maintain regular attendance during the temporary transitional work process.
- Only perform the work tasks identified by supervisor while working within the restrictions as indicated by the healthcare provider – restrictions shall be always followed.
- Attend all medical appointments as necessary.
- Limit time away from work by scheduling appointments and therapy outside of work whenever possible.
- Cooperate with return-to-work efforts and work with your healthcare provider and your supervisor to return to work on a light duty basis, as soon as possible.
- Report information to the Human Resources Manager on a timely basis, including:
- All medical appointments
- Copies of the diagnosis, treatment, and physical capabilities of consideration for transitional work (light duty)
- Changes in medical status
- Obtain a full duty release from the healthcare provider when medically able to return to your full work duties.
- Observe and practice all safe work practices.

Supervisor's Responsibility:

It is a supervisor's responsibility for providing a safe working environment and for reporting any unsafe conditions to management. These responsibilities include:

- Preventing accidents
- Investigating accidents

- Identifying temporary modified and alternate work
- Communicating with the injured employee and management

Accident Prevention:

To prevent accidents and maintain worksite safety, be sure to:

- Set an example through actions and attitude that stresses the importance of safety among employees
- Instruct Group Leaders, Foremen, etc., regarding their safety duties and periodically stress, as necessary, that these duties are to be performed along with other regular job functions.
- Assure that Group Leaders, Foremen, etc., maintain an effective program to: (1) educate their people on the hazards inherent in their jobs, (2) instruct them in safe work practices, and (3) train them so that they will motivate themselves to work safely
- Keep advised of safety conditions, practices and needs in the department through daily contact with employees
- Conduct periodic inspections and make appropriate recommendations
- Identify and eliminate possible hazards in the workplace
- Participate in safety committees
- Ensure safe work practices

Post Injury Response:

After an injury occurs, the response will affect all employees. Supervisor's must:

- Take time to handle the injury promptly and thoroughly
- When applicable, escort the employee to the primary medical care facility
- Conduct the accident investigation promptly and record all pertinent information about the accident on the Incident Investigation Report
- Treat the employee as you would like to be treated: with dignity and compassion
- Work with safety manager to ensure that corrective action is taken to eliminate conditions which cause the accident
- Keep informed on the medical progress of all employees under supervision who have suffered an injury
- Always keep open all lines of communication with management, the safety manager and all employees

Return to Work:

If an injured employee experiences temporary total disability, we must all work together to ensure an easy transition from disability to return to work. Alongside members of the Crisis Team, it is the supervisor's responsibility to:

- Call the employee. Frequency to be determined based on injury type.
- Reassure the employee that the team needs him/her to return to work
- Welcome employees returning to work
- Think about abilities, not disabilities. What can the employee do?
- Coordinate appropriate modifications to the employee's regular job or, if necessary, provide a temporary alternate position within the employee's physical capabilities.
- Explain new duties carefully and emphasize the temporary nature of the transitional work
- Upon the employee's return, discuss how to prevent a similar injury in the future

Section 6: Responsibilities of Subcontractors

Policy

It is the policy of LMM that all subcontractors and tier-contractors comply fully with the LMM Safety Program, and all adjacent requirements imposed by the Project Owner. The purpose of this program is to ensure that LMM continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection and development of our subcontractors. This program applies to all LMM locations that use subcontractors. All LMM subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by LMM. Approval requirements include:

- A formal safety review of the subcontractor being performed by LMM safety department.
- The review matched the level of hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations, and requirements of LMM.
- The subcontractor agrees to abide by our Drug and Alcohol policy and on-site safety rules throughout the duration of the work.

Any subcontractor that has a "non-Approved" safety status will not be used on any LMM site.

Pre-Qualification of Subcontractors:

Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics. LMM will use a combination of safety metrics to prequalify subcontractors as shown below.

Safety Metrics, Such as TRIR, EMR, DART and Fatality Rate Will be Used as a Criteria for Selecting Subcontractors:

Safety metrics will be used as criteria for prequalifying and selecting subcontractors in the following manner. Key performance indicators such as the TRIR, EMR, DART and Fatality rates shall be reviewed. 3rd parties such as ISN, Avetta, et al.

Subcontractor Involvement:

Contractors are required to follow or implement the work practices and systems described below while performing work at LMM worksites:

- Attend a safety orientation, included in any pre-job meeting or kick-off meeting provided by LMM prior to any work beginning.
- Monitor employees for substance abuse and report nonconformities to LMM
- Ensure personnel have the required training and competency for their work.
- Included in LMM tailgate safety meetings, job safety analysis or hazard assessments and on the job safety inspections.
- Perform a pre-job safety inspection that includes equipment.
- Participate in the BBS hazard reporting system.
- Report all injuries, spills, property damage incidents and near misses.
- Comply with onsite and Owner Client safety rules.
- Implement LMM safety practices and processes as applicable.
- Clean up and restore the worksite after the job is over.
- Ensure compliance with regulations at all times.
- Post job-safety performance reviews - shall be conducted for subcontractors based on their adherence to the above requirements, safety key performance indicators and other agreed upon requirements.

Upon completion of project, LMM will conduct a post-job performance review on subcontractor.

Duties shall include but are not limited to:

- Consideration of all safety factors during the bidding and planning stages of the job.
- Compliance with all Federal, State, and Local safety regulations.
- Compliance with the safety programs of the Contract Owner and LMM.
- Provide and enforce the use of personal protective equipment.
- Promptly investigate any accident, injury, or damage to property and file a report with LMM Project Manager within 24 hours.

- Comply with all record keeping requirements of the government, the Contract Owner, and the insurance company. Copies of these records must be available for inspection by LMM's Safety Manager.
- Maintain and use tools, equipment, and machinery in safe condition.
- Maintain good housekeeping conditions and fire protection equipment.

Require participation in all the following or described in the LMM Safety Program:

- New employee orientation for each employee.
- Weekly toolbox safety meetings for all employees.
- Attendance at project meetings where safety is part of the regular planning meeting (General Foreman/Competent Person).
- Maintain documentation of employee participation in safety meetings.
- Maintain a log of disciplinary action taken on safety violations.
- Maintain and submit to LMM: daily and monthly, manpower reporting.

Section 7: Inspections by OSHA, MIOSHA and other public safety agencies

Policy

The diverse scope of our work and the geographically scattered locations of our projects cause the LMM jobs to come under the jurisdiction of many different governmental agencies. The primary agency is the Occupational Safety and Health Administration (OSHA). There are also numerous state and local agencies which may have either concurrent or exclusive jurisdiction.

OSHA (and most state agencies) is required by law to conduct regular "Scheduled General Inspections" of construction sites. They may also inspect jobs because of a complaint from a worker or because of serious injuries. These inspections take place without prior notice. The inspecting officer will arrive at the job site, identify himself/herself, and announce their purpose. These inspecting officers have a legal procedure that they must follow.

If your project is selected for inspection, the following steps should be taken:

1. Contact the Safety Manger for information and/or assistance upon arrival of the officer.
2. If you are in an operating plant, contact the Owner. They may have some objections or restrictions, or they may just want to observe.
3. You must obtain authorization to allow entry of any person, organization, or group of people.
4. Treat the Compliance Officer with professional courtesy and respect.
5. ALWAYS accompany the Compliance Officer when they are on the job site. Make notes of what they observe, to whom they speak to, and take pictures where they take pictures.

6. The Compliance Officer is entitled to have a private interview with employees however, the employees' Foreman may be present if either party so desires.
7. The Compliance Officer is entitled to meet with all employee representatives during the inspection and to have an employee representative accompany them during the inspection. To avoid having all the employees walking in the inspection, ask them to elect one employee (if you have more than one) who will go on the walk around and who will notify other employees (as necessary) if there is a problem.
8. Make sure that your injury records are up to date. Also have crane and forklift inspections, GFCI, and Toolbox Safety Meetings, along with any other Safety Program documentation ready for review by the Compliance officer. NOTE: Never give the Compliance Officer a copy of anything!
9. At the closing conference, ask the Compliance Officer for a detailed list of the findings.

Forward a copy of that list to the Safety Manager. We do our job well. We have nothing to hide or to worry about during an OSHA inspection. Present this attitude to the Compliance Officer from the beginning. Show him that we are the best in the industry. A good attitude on our part will make the inspection easier and smoother for all involved.