

HSE MANUAL FOR

MPC, Corp.

ASSIGNMENT OF RESPONSIBILITIES

In accordance with OSHA regulations, the above named company has assigned responsibility and accountability for the administration of our Health, Safety, and Environmental program to:

Tim Foster

Depending on your location, this HSE program may also be referred to as an SHE or EHS program.

The Federal OSHA designation is “HSE”; however, you will notice that all terms are used.

A copy of the HSE Program is available upon request for our employees’ review. Questions should be directed to Supervision or Management.



Print Date: April 11, 2023

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RESPONSIBILITIES

Tim Foster is the designated Company Safety Coordinator.

POLICY

The Occupational Safety and Health Act of 1970 clearly defines the requirement to provide safe and healthful working conditions for all employees. Therefore, the safety and health of our employees is the first consideration in operating this business.

Safety and health in our business must be part of every operation. Without question, it is every employee's responsibility at all levels.

It is the intent of MPC, Corp. to comply with all laws. To do this, we must constantly be aware of conditions in all work areas that can produce injuries. No employees will be required to work at a job they know is not safe or healthful. Your cooperation in detecting hazards and, in turn, controlling them, is a condition of your employment. Inform your supervisor immediately of any situation beyond your ability or authority to correct.

The personal safety and health of each employee of MPC, Corp. is of primary importance. Prevention of occupationally induced injuries and illnesses is of such consequence that it will be given precedence over operating productivity, whenever necessary. To the greatest degree possible, management will provide all mechanical and physical activities required for personal safety and health, in keeping with the highest standards.

We will maintain an occupational safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody proper attitudes towards injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and their co-workers. Only through such a cooperative effort, can a safety and health program, in the best interest of all, be established and preserved.

Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of operations similar to ours. Our goal is zero accidents and injuries.

Our safety and health program includes:

- Providing mechanical and physical safeguards to the maximum extent possible
- Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, to control health hazards, and to fully comply with OSHA safety and health standards for every job
- Training all employees in good safety and health practices
- Providing necessary personal protective equipment, and instructions for proper use and care
- Developing and enforcing safety and health rules, and requiring that employees cooperate with these rules as a condition of employment
- Investigating, promptly and thoroughly, every accident to find out what caused it, and correct the problem so it will not happen again

We recognize that responsibilities for occupational safety and health are shared:

- This employer accepts responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe work conditions
- Supervisors are responsible for developing proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves
- Employees are responsible for wholehearted, genuine operations of all aspects of the safety and health program – including compliance with the rules and regulations – and for continuously practicing safety and health while performing their duties

Tim Foster will ensure that all employees are properly instructed and supervised in the safe operation of any machinery, tools, equipment, process, or practice that they are authorized to use or apply while at work.

Production is never so urgent that we cannot take the time to do our work safely.

Program Goals

Why have a workplace “Safety and Health Plan”? Taking risks is part of running a business, particularly for small business owners. You take risks in product development, marketing, and advertising in order to stay competitive. However, some risks should never be taken. One of these is risking the safety and health of workers. Safety begins at the top and goes downward throughout The Company. The primary goal of MPC, Corp. is to continue operating a profitable business while protecting employees from injuries or illness. This can be achieved by delegating responsibility and accountability to all involved in MPC, Corp.’s operation.

Responsibility: Having to answer for activities and results

- Accountability: The actions taken by management to ensure the performance of responsibilities

In other words, to reach our goal of a safe workplace, everyone needs to take responsibility and be held accountable.

Benefits of achieving our goals are:

- Minimizing of injuries and accidents
- Minimizing the loss of property and equipment
- Elimination of potential fatalities
- Elimination of potential permanent disabilities
- Elimination of potential OSHA fines
- Reductions in Workers’ Compensation costs
- Reductions in operating costs
- Having the best “Safety and Health” conditions possible in the workplace

Management Commitment

MPC, Corp. is committed to building an effective injury and illness prevention plan, putting it in writing, and integrating it into the entire operation.

The management of MPC, Corp. is committed this safety policy, and to provide direction and motivation by:

- Appointing Safety Coordinator(s) and/or Safety Committee Chairmen
- Establishing Company safety goals and objectives
- Developing and implementing this written Safety and Health program
- Ensuring total commitment to the Safety and Health program
- Facilitating employees' safety training
- Establishing responsibilities for management and employees to follow
- Ensuring that management and employees are held accountable for performance of their safety responsibilities
- Establishing and enforcing disciplinary procedures for employees
- Reviewing the Safety and Health program annually, and revising or updating as needed

Labor and Management Accountability

All employees, both labor and management, need to understand their responsibilities under OSHA rules and be held accountable for complying with the rules as well as the Company's related policies.

It is the responsibility of MPC, Corp. to provide a safe and healthful work environment for their employees. However, holding everyone accountable for their part in workplace safety and health is critical for a successful injury and illness prevention plan.

Assignment of Responsibility

The Safety Coordinator(s) and/or Safety Committee Members MPC, Corp. has designated:

Safety Coordinator	Tim Foster
Safety Coordinator	
Safety Committee Chair	
Safety Committee Vice-chairman	
Safety Committee Alternate Chair/Vice-chair	

Their cell phone and office phone numbers are:

Safety Person's Name	Office Phone #	Cell Phone #

Tim Foster will assist managers in initiating, educating, and executing the safety program with:

- Introducing the safety program to new employees
- Following up on recommendations, suggestions, etc., made at the "Weekly" safety meetings. All topics of safety concerns must be documented accordingly
- Assisting the personnel in the execution of standard policies
- Conducting safety inspections on a periodic basis
- Addressing all hazards or potential hazards as needed
- Preparing monthly accident reports and investigations
- Maintaining adequate and available first aid supplies and safety equipment
- Ensuring an adequate number of qualified "First Aid Certified" people on the work site
- Becoming thoroughly familiar with OSHA regulations and local and state safety codes
- Defining the responsibilities for safety and health of all subordinates and holding each person accountable for their results through the formal appraisal system and where necessary, disciplinary procedures
- Emphasizing the unnecessary personal and financial losses of all accidents

Employee Involvement

Employees are required to work in compliance with the safety rules, report all accidents and near misses, and report all unsafe conditions or unsafe practices. To demonstrate MPC, Corp.'s commitment to support the employees in these responsibilities, MPC, Corp. will do the following:

Communication System:

- Encourage employees to inform MPC, Corp. about workplace hazards without fear of reprisal
- Establish and maintain a centrally located "Safety Bulletin Board" where current, relevant information may be easily reviewed by employees
- Schedule general employee meetings where safety is freely and openly discussed by those present. These meetings will be regular, scheduled, and announced to all employees and managers to achieve maximum attendance. The purpose of these meetings is safety, and the concentration will be on:
 - Occupational accident and injury history at our work sites, with possible comparison to other locations within The Company
 - Feedback from the Safety Committee
 - Guest speakers concerned with workplace safety and health
 - When possible, brief audio-visual materials that relate to our business
- Conduct training programs for communicating with employees
- Provide a safety suggestion box so that employees, anonymously if desired, can communicate their concerns with management
- Document all communication efforts to demonstrate that an effective communication system is in place

Hazard Identification and Control

Periodic inspections and procedures for correction provide methods of identifying existing or potential hazards in the workplace, and eliminating or controlling them. Hazard control is essential to an effective injury and illness plan. We will be sure to look at safe work practices and ensure that they are being followed, and that unsafe conditions or procedures are identified and corrected properly and promptly.

Employees are encouraged to report possible hazardous situations, knowing their reports will be given prompt and serious attention. Workplace equipment and personal protective equipment will be maintained in good, safe working condition.

Hazards, where possible, will be corrected as soon as they are identified. For those that cannot be immediately corrected, a target date for correction will be set. MPC, Corp. will provide interim protection for workers while hazards are being corrected. A written tracking system will be established to help monitor the progress of the hazard correction process.

Accident/Incident Investigation

Employers and safety committees are required to investigate or assign responsibility for investigating accidents. Trained individuals, with the primary focus of understanding why the accident or incident occurred, will investigate accidents/incidents and what actions can be taken to preclude recurrence. The focus will be on solutions and never on blame. They will be in writing, and adequately identify the causes of the accident or near miss occurrence.

Worker Training

Training is another essential element of any injury and illness prevention plan. OSHA rules require each employer to train workers for any job or task they are assigned.

Our plan includes training and instruction:

- For all employees when they are first hired
- For all new employees for each specific task
- For all employees given new job assignments for which training has not already been received
- Whenever new substances, processes, procedures, or equipment are introduced into the workplace and present a new hazard
- Whenever new personal protective equipment or different work practices are used on existing hazards
- Whenever MPC, Corp. is made aware of a new or previously unrecognized hazard
- For all supervisors to ensure they are familiar with the safety and health hazards to which employees under their immediate direction and control may be exposed

An effective safety and health plan requires proper job performance by everyone in the workplace.

It is the determination of MPC, Corp. to ensure that all employees are knowledgeable about the materials and equipment with which they work, what known hazards are present, and how they are controlled.

Program Evaluation

Regular reviews will be held to look at the components of our safety and health plan, to determine what is working well and what changes, if any, are needed. All employees are encouraged to participate by keeping MPC, Corp. informed of their concerns regarding the elements of this safety and health plan.

The success of this safety and health plan is dependent upon two things: First, MPC, Corp. must provide a safe and healthful environment in which the employee has the opportunity to work safe, and second, the employee must choose to work safe.

Supervisor/Foreman

The Supervisors and/or Foremen will establish an operating atmosphere to ensure that safety and health is managed in the same manner and with the same emphasis as production, cost, and quality control. This will be accomplished by:

- Regularly emphasizing that accident and health hazard exposure prevention are not only moral responsibilities, but also a condition of employment
- Identifying operational oversights that could contribute to accidents which often result in injuries and property damage
- Participating in safety and health related activities, (e.g. safety meetings, facility reviews, and correcting dangerous employee behavior)
- Explaining the safety policies and the hazards of each person's particular work
- Ensuring that initial orientation of "new hires" is properly carried out
- Making sure that if a "Competent Person" is required, that one is present to oversee, and instruct employees when necessary
- Never short-cutting safety for expediency, nor allowing workers to do so
- Consistently enforce safety rules and enforce discipline
- Conducting daily job-site inspections and correcting noted safety violations

Employees

It is the duty of all employees to know the safety rules, and conduct their work in compliance with these rules. Disregard of the safety and health rules shall be grounds for disciplinary action up to and including termination. It is also the duty of each employee to make full use of the safeguards provided for their protection. Every employee will receive an orientation when hired and receive a copy of any Company Safety and Health Programs. Employee responsibilities include the following:

- Reading, understanding and following safety and health rules and procedures
- Signing the Code of Safe Practices and any other policy acknowledgements
- Wearing Personal Protective Equipment (PPE) at all times when working in areas where there is a possible danger of injury
- Wearing suitable work clothes as determined by the supervisor/foreman
- Performing all tasks safely as directed by their supervisor/foreman
- Reporting ALL injuries, no matter how slight, to their supervisor/foreman immediately and seeking treatment promptly
- Knowing the location of first aid, firefighting equipment, and safety devices
- Attending any and all required safety and health meetings
- Not performing potentially hazardous tasks, or using any hazardous material until properly trained, and following all safety procedures for those tasks
- Stop and ask questions when unsure about how to safely do the work

MEDICAL FACILITIES

Each worksite will identify and contact an appropriate hospital or clinic to ensure they can handle possible emergencies and injuries in a timely manner. The location and contact information for the medical facility will be provided to all employees and posted at the worksite in a place all employees gather.

POSTING REQUIREMENTS

All Federal, State, and Local posting requirements will be posted at the worksite in a place all employees gather. Particularly the OSHA Job Safety and Health poster, state labor law postings, required insurance postings, and emergency contact numbers.

HSE SUPERVISOR

At least one supervisor will be at the worksite at all times who is designated the Health, Safety, and Environmental Supervisor. This person will have at least appropriate OSHA 10 Hour Outreach Training and meet OSHA's definition for Competent or Qualified Person for the task at hand.

EVALUATING SAFETY PROGRAM PERFORMANCE

The effectiveness of this safety plan will be evaluated at least annually using leading and lagging indicators compared year after year to measure the effectiveness of the safety policy and established safe work procedures.

Lagging indicators compared will include the Experience Modification Rate (EMR) and other recorded injuries and incidents such as TRIR, DART, and fatalities.

Leading indicators compared include: documented near miss investigations, employee training records, recorded hazardous conditions investigations, safe work permits (e.g. confined spaces, hot work), and maintenance checklists.

The safety professional will complete an annual report of these safety program performance metric measurements with suggested changes to the safety policy and safe work procedures.

CODE OF CONDUCT

All MPC, Corp. employees will abide by our company Code of Conduct when performing any company business activities. MPC, Corp. will further ensure that company employees adhere to all client requirements and safe practices when performing work at the client site.

MPC, Corp. employees will not:

- Engage in any unlawful or unethical activities
- Divulge any company or client confidential or proprietary information to unauthorized personnel
- Use or tolerate the use of, drugs or alcohol at the workplace
- Engage in any actions that constitute sexual harassment or workplace violence

Reporting Violations

Employees will be required to report any safety, health or ethical violations to the company as soon as possible.

The company will establish a method that allows employees to report any Code of Conduct violations anonymously and without fear of reprisal.

Communication

This Code of Conduct will communicated to all employees at their times of hire, and will be reviewed at least annually, or when any changes are made.

Disciplinary Actions

The company will investigate all reports of violations, and any employees found to have violated our Code of Conduct will be subject to progressive disciplinary action according to our disciplinary policy, up to and including termination.

Any violations of our Code of Conduct deemed to illegal or unlawful will be reported to the appropriate authorities.

Commitment

The goal of MPC, Corp. is to operate a profitable business with the highest possible standards of integrity. This can be achieved by ensuring that all employees abide by our Code of Conduct. We are committed to operating in a professional and courteous manner in all of our business practices.

Owner Name	Owner Signature	Date
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TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. is committed to accident prevention in order to protect the safety and health of all our employees. Injury and illness losses due to hazards are needless, costly, and preventable. To prevent these losses, a joint management/worker safety committee will be established. Employee involvement in accident prevention and support of safety committee members and activities is necessary to ensure a safe and healthful workplace for all employees.

RESPONSIBILITIES

MPC, Corp. Safety Committee members are:

Tim Foster

The Safety Committee will meet a minimum of zero time per year.

Committee Goal

Our Company will strive to meet the following goals:

- Minimize injury and illness in the workplace
- Open up the lines of communication between management and employees concerning safety at every level of The Company
- Improve safety of facilities(s) and equipment for a better work environment

Mission Statement

It is our Company and committee's goal to create clear avenues of communication among management and staff to create a safe working environment.

Company Commitment

MPC, Corp. is committed to excelling at safety, and will support the safety committee's purpose and recommendations.

Communication of Safety Matters

The committee will handle all safety issues with diligence. We hope to encourage an atmosphere where all employees report safety violations or concerns, ask questions, seek training, or come to us with any safety issues.

Purpose

The purpose of our safety committee is to bring workers and management together in a non-adversarial, cooperative effort to promote safety and health in the workplace. The safety committee will assist management and make recommendations for change.

Organization

There will be, in most cases, an equal number of employee and employer representatives. However, there may be more employee representatives than employer representatives, if both groups agree. Employee representatives shall be volunteers or elected by their peers. If no employees volunteer or are elected, then they may be appointed by management. Employer representatives will be appointed. Safety committee members will serve a continuous term of at least one year.

Committee membership terms will be staggered so that at least one experienced member is always on the committee.

Extent of Authority

It must be clearly understood that the safety committee advises management on issues that will promote safety and health in the workplace. Written recommendations are expected from the safety committee and they will be submitted to management. In turn, management will give serious consideration to the recommendations submitted and will respond in writing to the committee within a reasonable time.

Functions

- Committee meetings and employee involvement
- Hazard assessment and control
- Safety and health planning
- Evaluation of accountability system
- Evaluation of management commitment to workplace safety and health
- Evaluation of accident and incident investigation program
- Safety and health training

Recommendations

All recommendations submitted to management must be written and should be clear and concise; provide reasons for implementation; give recommended options; show implementation costs and recommended completion dates; list benefits to be gained.

Procedures

The committee's plan of action requires procedures by which the committee may successfully fulfill its role. Procedures developed should include but not be limited to:

- Meeting date, time, and location (Safety Committee Meeting Agenda)
- Election of chairperson and secretary
- Order of business
- Records (Safety Committee Meeting Minutes)

Duties of each member must include, but not be limited to:

- Reporting unsafe conditions and practices
- Attending all safety and health meetings
- Reviewing all accidents and near-misses
- Recommending ideas for improving safety and health
- Working in a safe and healthful manner
- Observing how safety and health is enforced in the workplace
- Completing assignments given to them by the chairperson
- Acting as a work area representative in matters of health and safety
- Others as determined by Company safety and health needs

The Safety Coordinator(s) and/or Safety Committee Members

MPC, Corp. has designated:

Safety Coordinator	Tim Foster
Safety Coordinator	
Safety Committee Chair	
Safety Committee Vice-chairman	
Safety Committee Alternate Chair/Vice-chair	

Their cell phone and office phone numbers are:

Safety Person's Name	Office Phone #	Cell Phone #

It is the duty of Tim Foster, the Safety Coordinator, to assist the Supervisor/Foreman and all other levels of Management in the initiation, education, and execution of an effective safety program.

PROCEDURES

The purpose of a safety committee is to bring workers and managers together to achieve and maintain a safe, healthful workplace. It is easy to start a safety committee, but developing an effective one – one that achieves and maintains a safe, healthful workplace – requires workers and managers who are committed to achieving that goal. Effective safety committees find solutions to problems that cause workplace accidents, illnesses, and injuries. Fewer accidents, injuries, and illnesses mean lower Workers' Compensation claims costs and insurance rates.

Understand a Safety Committee's Seven Essential Activities

Anyone can start a safety committee, but, to make it effective, the committee must be built on a foundation of management commitment and must be accountable for achieving its goals. The committee must do the following:

- Involve employees in achieving the committee's goals
- Identify workplace hazards
- Review reports of accidents and near misses
- Keep accurate records of committee activities
- Evaluate its strengths and weaknesses

Commitment

The committee will not survive without management support. Management demonstrates support by encouraging employees to get involved in achieving a safe, healthful workplace and by acting on the committee's recommendations. Representatives demonstrate commitment by attending committee meetings, following through on their assigned tasks, and encouraging other employees to get involved in identifying hazards.

Accountability

Representatives should understand that the committee expects them to contribute; each representative shares responsibility for accomplishing safety committee goals, which benefit everyone who works for The Company.

The safety committee is also responsible for monitoring how management holds employees accountable for working safely and for recommending ways to strengthen accountability.

Employee Involvement

To become effective, a safety committee needs help from everyone in The Company. The safety committee must have a method for employees to report hazards and to offer safety suggestions.

Ways the safety committee can encourage employees to get involved:

- Encourage employees to report hazards and unsafe work practices to a safety-committee representative
- Act on employee suggestions and recognize their contributions to a safer workplace
- Promote the committee's activities and accomplishments

Make sure employees know that you are starting a safety committee. Tell them why you are starting the committee, describe its role in The Company's safety-and-health program, and explain management's commitment to the committee.

You can inform employees in a memo or a newsletter, by e-mail, or – better yet – meet with them to promote the committee and to answer questions.

Hazard Identification

The safety committee plays an important role in keeping the workplace hazard-free:

- Ensure that representatives know how to recognize hazards and understand basic principles for controlling them
- Focus on identifying hazards and unsafe work practices that are likely to cause serious injuries
- Conduct thorough workplace inspections at least quarterly
- Document hazards during quarterly inspections and discuss how to control them at regular safety-committee meetings
- Include employer and employee representatives on the inspection team

Accident Investigation

The committee must have a procedure for investigating all workplace accidents, illness, and deaths. It is not necessary for the committee to conduct accident investigations or to participate in investigations; however, the committee should ensure that management does so. The committee should also carefully review accident reports to help management identify accident causes and determine how to control them.

Recordkeeping

You may not think of record keeping as an essential activity, but accurate, well-organized records document the committee's accomplishments and can inform the committee what it needs to do to improve.

The following documents are required for the safety committee's file:

- Accurate minutes of each safety committee meeting
- Committee reports, evaluations, and recommendations
- Management's response to committee recommendations
- Employee safety suggestions and hazard concerns

Evaluation

Evaluation answers the question "Are we effective?" Effective safety committees periodically evaluate their strengths and weaknesses, and the evaluation helps them set new goals.

At least once a year, schedule a half-day safety-committee meeting to accomplish the following: identify the committee's achievements over the past 12 months, review essential activities, and set goals for the next 12 months.

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. will maintain a “Safety and Health Program” conforming to the best practices of organizations of this type. To be successful, such a program must embody the proper attitudes toward injury and illness prevention on the part of supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and his or her co-workers. Only through such a cooperative effort, can a safety program in the best interest of all be established and preserved. Safety and health in our business must be a part of every operation.

Tim Foster is responsible for the implementation and enforcement of the following safety rules. Disciplinary procedures will be enforced.

THE COMPANY SAFETY AND HEALTH PROGRAM INCLUDES:

- Providing mechanical and physical safeguards to the maximum extent possible
- Conducting a program of safety and health inspections to find and eliminate unsafe working conditions or practices, to control health hazards, and to comply fully with the safety and health standards for every job
- Training all employees in good safety and health practices
- Providing necessary personal protective equipment and instructions for its use and care
- Developing and enforcing safety and health rules and requiring that employees cooperate with these rules as a condition of employment
- Investigating, promptly and thoroughly, every accident to find out what caused it and to correct the problem so that it will not happen again
- Setting up a system of recognition and awards for outstanding safety service or performance

RESPONSIBILITIES

We recognize that the responsibilities for safety and health are shared:

- MPC, Corp. accepts the responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions
- Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves
- Employees are responsible for wholehearted, genuine operation with all aspects of the Safety and Health Program including compliance with all rules and regulations – and for continuously practicing safety while performing their duties

GENERAL SAFETY RULES

MPC, Corp. employees shall follow these safe practice rules, render every possible aid to safe operations, and report all unsafe conditions or practices to their supervisor.

- Failure to abide by the Code of Safe Practices may result in disciplinary action up to and including termination
- Supervisors shall insist that employees observe and obey every rule, regulation, and order necessary to the safe conduct of the work, and shall take such action necessary to obtain compliance.
- If you are unsure of the safe method to do your job, STOP and ask your supervisor. Ignorance is no excuse for a safety violation
- All employees shall be given frequent accident prevention instructions. Instructions, practice drills, or articles concerning workplace safety and health shall be given at least once every 5 working days
- No one shall knowingly be permitted to work while the employee's ability or alertness is impaired by fatigue, illness, and prescription or over the counter drugs. Employees who are suspected of being under the influence of illegal or intoxicating substances, impaired by fatigue or an illness, shall be prohibited from working
- Employees should be alert to see that all guards and other protective devices are in proper places and adjusted, and shall report deficiencies. Approved protective equipment shall be worn in specified work areas
- Horseplay, scuffling, fighting and other acts are prohibited
- Work shall be well-planned and supervised to prevent injuries when working with equipment and handling heavy materials
- Workers shall not handle or tamper with any electrical equipment, machinery, or air or water lines in a manner not within the scope of their duties, unless they have received instructions from their supervisor. Do not attempt operate equipment until you are fully trained and authorized
- Keep your work area clean, free of debris, electrical cords, and other hazards. Immediately clean up spilled liquids
- Always notify all other individuals in your area who might be endangered by the work you are doing
- A red tag system identifies equipment that is NOT to be operated, energized, or used. All lock-out/tag-out notices and procedures must be observed and obeyed
- Do not block exits, fire doors, aisles, fire extinguishers, first aid kits, emergency equipment, electrical panels, or traffic lanes
- Do not leave tools, materials, or other objects on the floor that might cause others to trip and fall.
- Do not distract others while working. If conversation is necessary, make sure eye contact is made prior to communicating
- Employees shall not enter manholes, underground vaults, chambers, tanks, silos, or other similar places that receive little ventilation, unless it has been determined that it is safe to enter. Confined space protocols will be followed
- Materials, tools, or other objects shall not be thrown from buildings or structures until proper precautions are taken to protect others from the falling objects
- Employees shall cleanse thoroughly after handling hazardous substances, and follow special instructions from authorized sources

- Gasoline or other flammable liquids shall not be used for cleaning purposes
- No burning, welding, or other source of ignition shall be applied to any enclosed tank or vessel, even if there are some openings, until it has first been determined that no possibility of explosion exists, and authority for the work is obtained from the foreman or superintendent
- Any damage to scaffolds, falsework, or other supporting structures shall be immediately reported to the foreman and repaired before use
- Possession of firearms, weapons, illegal drugs or alcoholic beverages on Company or customer property or the job site is strictly prohibited
- All injuries shall be reported promptly to your supervisor so that arrangements can be made for medical and/or first-aid treatment

ENFORCEMENT OF SAFETY POLICIES

The compliance of all employees with MPC, Corp. Safety and Health Program is mandatory and shall be considered a condition of employment. All safety rules, procedures, and plans in effect are to be followed as specified in the safety program. Employees found to be in violation of Company safety policy may be subject to penalty.

Tim Foster is the supervisor for disciplinary actions and any employee in a position of management or supervisory capacity may initiate disciplinary action against any employee found to be in violation of Company policy. Not following verbal or written safety procedures, guidelines, rules, horseplay, failure to wear selected Personal Protective Equipment (PPE), and/or abuse of selected PPE, constitutes a safety violation.

The following outlines the disciplinary measures that will be taken against employees found to be in violation:

Periodic safety inspections of the workplace and equipment will be undertaken to ensure that all personnel, including supervisory positions, are demonstrating the required commitment to safety. A general neglect of safe work procedures, practices, and requirements in the workplace, or neglect of equipment safety, will be viewed as a lack of supervisory enforcement of safety policy and the appropriate supervisor/management personnel will be subject to the same disciplinary procedures described below.

The following programs will be utilized to ensure employee compliance with the safety program and all safety rules: training programs, retraining, optional safety incentive programs, disciplinary action.

Training Programs

The importance of safe work practices and the consequences of failing to abide by safety rules will be covered in the New Employee Safety Orientation and at Tailgate/Toolbox Safety Training. This will help ensure that all employees understand and abide by The Company's safety policies.

Retraining

Employees that are observed performing unsafe acts or not following proper procedures or rules will be retrained by their foreman or supervisor. A Safety Contact Report may be completed by the supervisor to document the training. If multiple employees are involved, additional safety meetings will be held.

SAFETY INCENTIVE PROGRAMS

Although strict adherence to safety policies and procedures is required of all employees, The Company may choose to periodically provide recognition of safety-conscious employees and jobsites without accidents through a safety incentive program.

DISCIPLINARY ACTION

The failure of an employee to adhere to safety policies and procedures established by MPC, Corp. can have a serious impact on everyone concerned. An unsafe act can threaten not only the health and well-being of the employee committing the unsafe act but can also affect the safety of his/her coworkers and/or customers. Accordingly, any employee who violates any of The Company's safety policies will be subject to disciplinary action.

When a "Safety Violation Notice" is issued, appropriate supervisory personnel will meet with employee(s) to discuss the infraction and inform individual(s) of the rule or procedure that was violated and the corrective action to be taken.

Note: Failure to promptly report any on-the-job accident or injury, on the same day as occurrence, is considered a serious violation of The Company's Code of Safe Practices. Any employee who fails to immediately report a work-related accident or injury, no matter how minor will be subject to disciplinary action.

Employees will be disciplined for infractions of safety rules and unsafe work practices that are observed, not just those that result in an injury. Often, when an injury occurs, the accident investigation will reveal that the injury was caused because the employee violated an established safety rule and/or safe work practice(s).

In any disciplinary action, the foreman should be cautious that discipline is given to the employee for safety violations, and not simply because the employee was injured on the job or filed a Workers' Compensation claim.

Violations of safety rules and the Code of Safe Practices are to be considered equal to violations of other Company policy. Discipline for safety violations will be administered in a manner that is consistent with The Company's system of progressive discipline. If, after training, violations occur, disciplinary action will be taken as follows:

1. Oral warning. Documented, including date and facts on the "Safety Warning Report" form. Add any pertinent witness statements. Restate the policy and correct practice(s)
2. Written warning. Retrain as to correct procedure/practice
3. Written warning with suspension
4. Termination

As in all disciplinary actions, each situation is to be carefully evaluated and investigated. The particular step taken in the disciplinary process will depend on the severity of the violation, employee history, and regard to safety. Foremen and superintendents should consult with the office if there is any question about whether or not disciplinary action is justified. Employees may be terminated immediately for willful or extremely serious violations. Union employees are entitled to the grievance process specified by their contract.

Note: Consistency in the enforcement of safety rules will be exercised at all times.

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. is committed to appropriately investigating all near misses, accidents, and incidents according to their severity to find the root cause and make changes that prevent it from happening again.

RESPONSIBILITIES

Accident investigation and reporting is a responsibility shared between the Company and its employees. Tim Foster will establish prior to an incident occurring, how and when proper personnel will be notified; who will conduct the investigation and the training they will receive and who is responsible for implementing any corrective actions.

Employer Responsibilities

- Ensuring appropriate staff receive suitable training to carry out their role in hazard and incident reporting, investigation and recording
- Completing training for Incident Investigation
- Promptly investigating incidents
- Implementing identified risk control measures to prevent recurrence of incidents
- Consulting with staff in relation to the measures to be taken to prevent recurrence of incidents
- Reviewing hazard/incident reports to ensure that all recommendations are implemented
- Ensuring, as far as is reasonably practicable, that adequate financial provision and other resources are made available to institute the recommended actions

Safety Committee Responsibilities

Safety committee members are encouraged to participate in investigations of incidents and assist with the development of measures to prevent their recurrence.

- Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques
- Training requirements relative to incident investigation and reporting (Awareness, First Responder, investigation, and training frequency) will be identified in this program

Employee Responsibilities

- Not placing themselves or others at risk of injury
- Reporting incidents to their supervisor or manager, and health and safety representative (if applicable), as soon as possible after the event
- Participating in the development of appropriate risk control measures to prevent recurrence of similar incidents
- Using risk control measures as required and any other action taken, which is designed to protect health and safety

TRAINING

All personnel will receive, as part of their training in avoiding and preventing accidents and injuries, instruction concerning their roles and responsibilities in the event of an accident or incident. This training will include:

- What qualifies as reportable accidents or incidents (and near-misses)
- Who will be contacted in the event of a reportable incident
- An explanation of the accident/incident investigation plan
- Incident investigation techniques and employee responsibilities during and after an incident/accident

PROCEDURES

MPC, Corp., regardless of size and impact will investigate all injuries, illness, near misses and fatalities. All work related fatalities and catastrophes must be reported to OSHA within 8 hours. Serious accidents must be reported to OSHA within 24 hours. OSHA requires reporting of work related incidents resulting in the death of an employee or the hospitalization of one or more employees. Owner clients require all incidents to be reported including, but not limited to, injuries, spills, property damage, fires, explosions, and vehicle damage.

Accidents and near miss incidents that result in personal injury, property damage, chemical spill, or other emergencies will be immediately reported to the assigned supervisor at the time of the event and Emergency Medical Service, Fire Department, or Hazmat Services will be immediately summoned. Such events will be investigated and documented on the appropriate Company form. All forms will be fully completed and submitted to Tim Foster for review and for discussion at the next scheduled Safety Committee meeting. These investigations demonstrate the company's commitment to providing a safe and healthful work environment. Disciplinary Policy will be enforced.

To ensure accidents will be reported, employees must be encouraged to participate in the "fact-finding" process. The point emphasized must be that "hazardous conditions" and "unsafe practices" are an indication of a much bigger problem with a breakdown in the safety and health policy. The purpose of the accident investigation then becomes one that will uncover these system problems and provide solutions that will result in long-term corrective action.

It is important to gather facts and interview witnesses as soon as possible after an accident to ensure the most accurate information is being recorded. The efficiency of the corrective measures is determined by the accuracy of the information gathered. The best place to conduct an interview is wherever the employee being interviewed feels most comfortable. The most important interviewing technique you can use to ensure accuracy is to "listen".

Note: Consider the event a "serious accident" if an employee is admitted to a hospital for treatment or observation because of injuries suffered from a workplace accident.

MPC, Corp. will report severe injuries and/or fatalities using one of the following methods:

- By telephone or in person to the OSHA Area Office that is nearest to the site of the incident,
- By telephone to the OSHA central telephone number, 1-800-321-OSHA (1-800-321-6742),
- By using the reporting application located on OSHA's web site at www.osha.gov.

On Site First Response

Employees who could be first responders will be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

Prevent Further Loss

After an immediate rescue, MPC, Corp. will take actions to prevent further loss. For example:

Maintenance personnel will be summoned to assess integrity of building and equipment, engineering personnel to evaluate the need for bracing of structures, and special equipment/response requirements such as safe rendering of hazardous materials or explosives employed.

Secure the Accident/Incident Scene

Before investigating, the accident team needs to ensure the incident site is safe and secure for proper entry and investigation.

Securing the incident site will also help preserve any material evidence that might be altered or removed. Investigators can use cones, tape or guards to help keep the site secure.

Reporting Requirements

Local reporting sequence of events

Injuries

If a fatal injury, illness, or hospitalization of one (1) or more employees occurs, the plant manager will immediately notify the following persons and agency:

- Corporate Environmental Health and Safety (EHS) Director
- Division Manager (or any superior in this level)
- Group Manager or Team Leader (or any superior in this level)
- The area OSHA office (must be notified within 8 hours)

Involving the Environment

If an environmental incident occurs that must be reported to local, state, and/or federal agencies, the following persons will be notified:

- Corporate EHS Director
- Division Manager (or any superior in this level)
- Group Manager or Team Leader (or any superior in this level)
- Appropriate local, state and/or federal agency

Time Elements of when Incident will be Reported

MPC, Corp. is required to verbally report incidents to OSHA within 8 hours of discovery. Incidents must be reported to owner client as soon as possible (or within 24 hours).

Reportable Incidents

- injury, illness, death, hospitalization of employees
- spills, property damage, fires, explosions, vehicle damage

ACCIDENT/INCIDENT CAUSES

Accidents occur when hazards escape detection during preventive measures, such as a job or process safety assessment, when hazards are not obvious, or as the result of combinations of circumstances that were difficult to foresee. A thorough accident investigation may identify previously overlooked physical, environmental, or process hazards, the need for new or more extensive safety training, or unsafe work practices.

The primary focus of any accident investigation will be the determination of the facts surrounding the incident and the lessons that can be learned to prevent future similar occurrences. The focus of the investigation will NEVER be to place blame. The process will be positive and thought of as an opportunity for improvement.

WHEN ACCIDENT/INCIDENT INVESTIGATIONS ARE REQUIRED

As a rule, investigations will be conducted for:

- All injuries (even the very minor ones)
- All accidents with potential for injury
- Fires, explosions, Spills
- Property and/or product damage situations
- All "Near Misses" where there was potential for serious injury

Near-miss and incident reporting and investigation allow you to identify and control hazards before they cause a more serious incident. Accident/incident investigations are a tool for uncovering hazards that either were missed earlier or hazards where controls were defeated. However, it is important to remember that the investigation is only useful when its objective is to identify root causes. In other words, every contributing factor to the incident must be uncovered and recommendations made to prevent recurrence.

Accident/Incident Investigation Plan

When a serious accident occurs in the workplace, everyone will be too busy dealing with the emergency at hand to worry about putting together an investigation plan, so the best time to develop effective accident investigation procedures is before the accident occurs. Part of an effective Accident and Incident Investigation Plan is to assign responsibilities

The Plan will Include Procedures that Determine

- Who will be notified of accident?
- Who is authorized to notify outside agencies? (Fire, police, etc.)
- Who is assigned to conduct investigations?
- Training required for accident investigators:
- Who receives and acts on investigation reports?
- Timetables for conducting hazard correction.

GATHER INFORMATION

The next step is to gather useful information about what directly and indirectly contributed to the accident.

The proper equipment will be available to assist in conducting an investigation, writing equipment such as paper, pens, measuring equipment, cameras, small tools, audio recorder, Personal Protective Equipment (PPE), marking devices such as flags, equipment manuals, etc.

The following tools will be used to gather as much information as possible:

- Locate witnesses, ensuring unbiased testimony, & obtain appropriate interviewing location
- To ensure detailed interviews, interviewers must be trained
- Interview eyewitnesses as soon as possible after the accident. Interview witnesses separately, never as a group. Statements must be collected
- Interview other interested persons such as supervisors, co-workers, etc.
- Follow-up interviews with all witnesses
- Review related records such as: training records, disciplinary records, medical records, maintenance records, OSHA 300 log, safety committee records

Documentation

The following facts should be documented:

- Name of injured employee
- The time, date and location of the incident
- The severity and a detailed description of injury
- Name of the investigator and the date the investigation took place.

The incident can also be documented by photography, video recording or sketching the scene.

Evidence

Initial Identification of evidence immediately following the incident will include a listing of People, equipment, and materials involved and a recording of factors such as weather, illumination temperature, noise, ventilation, Etc.

MPC, Corp. must keep a collection of evidence, and ensure that it is preserved and secure. Evidence such as people, positions of equipment, parts, and papers must be preserved, secured, and collected through, notes, photographs, witness statements, flagging, and impounding of documents and equipment.

Develop a Sequence of Events

Use the information gathered to develop a detailed description of the accident. Make sure the accident is documented in enough detail to enable an individual unfamiliar with the situation to envision the sequence of events. Do not just describe the accident itself; include a description of events that led up to the accident.

Analyze the Accident/Incident

The next step is to determine the cause(s) of the accident. This is the most difficult step because first, the events must be analyzed to discover surface cause(s) for the accident, and then, by asking “why” a number of times, the related root causes are uncovered. Remember, surface causes are usually obvious and not too difficult to determine. However, it may take a great deal more time to accurately determine the weaknesses in the management system, or root causes, that contributed to the conditions and practices associated with the accident.

SURFACE CAUSES

The surface causes of accidents are those hazardous conditions and individual unsafe employee/manager behaviors that have directly caused or contributed in some way to the accident.

Hazardous Conditions may Exist in any of the Following Categories

- Materials
- Machinery
- Equipment
- Tools
- Chemicals
- Environment
- Workstations
- Facilities
- People
- Workload

It is important to know that most hazardous conditions in the workplace are the result of unsafe behaviors that produced them. Individual unsafe behaviors may occur at any level of the organization.

Some Example of Unsafe Employee/Manager Behaviors Include

- Failing to comply with rules
- Using unsafe methods
- Taking shortcuts
- Horseplay
- Failing to report injuries
- Failing to report hazards
- Allowing unsafe behaviors
- Failing to train
- Failing to supervise
- Failing to correct
- Scheduling too much work
- Ignoring worker stress

ROOT CAUSES

The root causes for accidents are the underlying system weaknesses that have somehow contributed to the existence of hazardous conditions and unsafe behaviors that represent surface causes of accidents. Root causes always pre-exist surface causes. Inadequately designed system components have the potential to feed and nurture hazardous conditions and unsafe behaviors. If root causes are left unchecked, surface causes will flourish! Root causes may be separated into two categories:

System Design Weaknesses

Missing or inadequately designed policies, programs, plans, processes, and procedures will affect conditions and practices generally throughout the workplace. Defects in system design represent hazardous system conditions.

System Implementation Weaknesses

Failures to initiate, carry out, or accomplish safety policies, programs, plans, processes, and procedures. Defects in implementation represent ineffective management behavior.

System design weaknesses: missing or inadequate safety policies/rules; training program not in place; poorly written plans; inadequate process; no procedures in place; develop preventive actions.

System implementation weaknesses: safety policies/rules are not being enforced; safety training is not being conducted; adequate supervision is not conducted; incident/accident analysis is inconsistent; lockout/tagout procedures are not reviewed annually.

Corrective Actions

All of the work done to this point culminates with recommendations to prevent similar accidents from happening in the future. Recommendations will relate directly to the surface and root causes of the accident. These recommendations will include recommended actions such as:

- Assigned responsibilities relative to the corrective actions
- Actions will be tracked to closure
- Engineering controls (for example, local exhaust ventilation or use of a lift assisting device)
- Work practice controls (for example, pre-plan work, and remove jewelry and loose fitting clothing before operating machinery)
- Administrative controls (e.g., standard operating procedures or worker rotation)
- Personal protective equipment (for example, safety glasses or respirators)

It is crucial that, after making recommendations to eliminate or reduce the surface causes, that the same procedure is used to recommend actions to correct the root causes. If root causes are not corrected, it is only a matter of time before a similar accident occurs.

Written Incident Report

Written incident reports will be prepared and include an incident report form and a detailed narrative statement concerning the event. The format of the narrative may include an introduction, methodology, summary of the incident, investigation board members names, narrative of the event, findings, and recommendations. Photographs, witness statements, drawings, etc. will be included

Documentation and Communications of Lessons Learned

Lessons learned will be reviewed and communicated. Changes to processes must be placed into effect to prevent reoccurrences or similar events.

SUMMARY

A successful accident investigation determines not only what happened, but determines how and why the accident occurred. Investigations are crucial as an effort to prevent a similar or perhaps more disastrous sequence of events.

Research has shown that a typical accident is the result of many related and unrelated factors that somehow all come together at the same time. Usually ten or more factors contribute to a serious accident. Although, this combination of factors normally makes an investigation very time consuming and resource intensive, the good news is that the accident can normally be prevented by removing only a few of the contributing factors.

EMPLOYEE INCIDENT REPORT

Work site: _____

Manager/Supervisor: _____

Employee name: _____ Date: _____

Job title: _____

Incident: _____

Action taken: _____

CODE OF CONDUCT:

- Proactive management includes Supervisory leadership and control to change unproductive activities. Conformance with safety policies, rules, and regulations is a necessary component of our Safety Program.
- Employee safety responsibilities are communicated during initial orientation. Safety rules and regulations are reviewed with employees by their supervisors and are part of the documented Employee Safety Training Process.
- Supervisors understand and enforce safety rules as a part of their job. This process may involve coaching, counseling, verbal, or written reprimands, and discipline in the form of suspension and/or termination. When appropriate, documented verbal warnings and reprimands are issued and carried out by supervisors.
- Failure to adhere to any of the Safety Rules and Safe Work Practices will result in disciplinary action. All discipline will be documented in the employee's folder. Discipline may be more severe depending on the offense.

Employee Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

Accident / Incident Report

Accident & Incident Report				PAGE 1
Date of Accident	Time	Day of Week ☐ S ☐ M ☐ T ☐ W ☐ T ☐ F ☐ S	Shift ☐ 1 ☐ 2 ☐ 3	Department
INJURED PERSON				
Name:		Address:		
Age:	Phone:			
Job Title:		Supervisor Name:		
Length of Employment at Company:		Length of Employment at Job:		
Employee Classification: ☐ Full Time ☐ Part Time ☐ Contract ☐ Temporary				
Nature of Injury:		☐ Bruising	☐ Dislocation	☐ Other (specify) Injured Body Part :
☐ Strain/Sprain	☐ Scratch/Abrasion	☐ Internal		
☐ Fracture	☐ Amputation	☐ Foreign Body	Remarks:	
☐ Laceration/Cut	☐ Burn/Scald	☐ Chemical Reaction		
Treatment:		Name and Address of Treating Physician or Facility:		
☐ First Aid				
☐ Emergency Room				
☐ Dr.'s Office				
☐ Hospitalization				
DAMAGED PROPERTY				
Property, Equipment, or Material Damaged:		Describe Damage:		
Object or Substance Inflicting Damage:				
INCIDENT DESCRIPTION				
Describe what happened: (attach photographs or diagrams if necessary)				
ROOT CAUSE ANALYSIS (Check All that Apply)				
Unsafe Acts	Unsafe Conditions	Management Deficiencies		
☐ Improper work technique	☐ Poor workstation design/layout	☐ Lack of written policies & procedures		
☐ Safety rule violation	☐ Congested work area	☐ Safety rules not enforced		
☐ Improper PPE or PPE not used	☐ Hazardous substances	☐ Hazards not identified		
☐ Operating without authority	☐ Fire or explosion hazard	☐ PPE unavailable		
☐ Failure to warn or secure	☐ Inadequate ventilation	☐ Insufficient worker training		
☐ Operating at improper speeds	☐ Improper material storage	☐ Insufficient supervisor training		
☐ By-passing safety devices	☐ Improper tool or equipment	☐ Improper maintenance		
☐ Guards not used	☐ Insufficient knowledge of job	☐ Inadequate supervision		
☐ Improper loading or placement	☐ Slippery conditions	☐ Inadequate job planning		
☐ Improper lifting	☐ Poor housekeeping	☐ Inadequate hiring practices		
☐ Servicing machinery in motion	☐ Excessive noise	☐ Inadequate workplace inspection		
☐ Horseplay	☐ Inadequate hazards guarding	☐ Inadequate equipment		
☐ Drug or alcohol use	☐ Defective tools/equipment	☐ Unsafe design or construction		
☐ Unnecessary haste	☐ Insufficient lighting	☐ Unrealistic scheduling		
☐ Unsafe act of others	☐ Inadequate fall protection	☐ Poor process design		
☐ Other:	☐ Other:	☐ Other:		

Accident & Incident Report

PAGE 2

ACCIDENT/INCIDENT ANALYSIS

Using the root cause analysis list on the previous page, explain the cause(s) of the incident in as much detail as possible.

Make sketches or illustrations to help describe incident:

How bad could the accident have been?

☐ Very Serious ☐ Serious ☐ Minor

What is the chance of the accident happening again?

☐ Frequent ☐ Occasional ☐ Rare

PREVENTIVE ACTIONS

Describe actions that will be taken to prevent recurrence:

Deadline

By Whom

Complete

INVESTIGATION TEAM

Name: _____

Signature:

Position:

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. has adopted this Behavior-based Safety Program for the safety of our employees and help prevent occupational injuries and illness.

The elements of our program consist of:

- Common Goals - Employee and Managerial commitment to the process
- Creating a systematic, ongoing process that defines a set of behaviors that reduce the risk of work-related injury, derived from safety assessments
- Training personnel in the Observation Process
- Observation and data collection on the frequency of critical safety practices
- Feedback and reinforcement to encourage and support positive safety practices
- Action Plan - Team meetings to decide on how to proceed, based on the data
- Review - Monitoring the progress of the Action Plan on a regular basis

OBSERVATION

A critical element in our Behavior-based Safety (BBS) Program depends on site observation. Site observation includes direct and open communication with the employees involved. The observer will:

- Meet with the worker at the site and introduce himself and the job being done
- Observe and monitor the worker, noting his safe behaviors
- Monitor the At-risk behaviors the worker is putting himself in

Observation Process Training

Training in the observation process will be established and implemented to the proper personnel. These individuals will be experienced employees of the Company. Training will consist of either classroom or on the job training.

Elements of the Training Program include:

- Who is to be trained
- Ensuring employees know the basic elements of the Behavior-based Program
- Ensuring that all employees involved in the process are trained in the classroom or on the job

The types of training that will be provided are:

- Management training: to ensure the common goals and process of the program are being met
- New employee training: effectively communicating the program to all employees
- Refresher training: to be performed as needed or when changes are made to the policy or procedure of the program

This training will include:

- Program objectives and incident report reviews
- How to conduct the site observations
- The observer's knowledge of the job procedures they observe
- Knowledge of the correct work and safety procedures involved
- How to complete the observation form
- How to determine and analyze At-risk behaviors
- Feedback training and role play (mentoring and coaching)- Employees should be aware they may be observed at any time

This training process will be documented in order to keep on record those qualified to observe on site behaviors and effectively implement the program's elements.

FEEDBACK

Communication is a crucial element in a successful Behavior-based Safety Program. To effectively accomplish this, feedback is of key importance.

The observer will start by commending the safe behavior the worker was doing during his work. You then want to explain, one by one, the At-risk behaviors the worker was doing. Then the observer asks the worker why he was putting himself at risk. For example, if the worker is welding a piece of metal and the sparks are flying in the workers direction. The observer would then ask the worker why he was not wearing protective clothing, like flame-retardant apron.

At this time the observer and worker will discuss the at-risk behaviors until the worker agrees to try the suggested recommendation made by the observer. The worker might be aware of his at-risk behavior or maybe not. The worker may be doing the at-risk behavior for a long time.

The Observer's job here is to highlight this behavior, then explain the associated negative consequences with this behavior. The above discussion and agreement is the individual feedback which helps the worker to change his behavior. This feedback is considered as a form of reward since:

- The worker got commendable comments on his safe behavior.
- The worker understood his at-risk behavior without being reprimanded at site or reported to his superiors for further penalties.

Key elements for the observer to remember during the feedback process are:

- Reviewing the observation with the employee
- Start with positive comments on behavior and procedure
- Reinforce these behaviors
- Describe and discuss the unsafe portions observed
- Determine the reasons for the unsafe actions with open-ended questions to the worker.

Re-emphasize that there are no negative consequences at this stage, so long as the observer and worker agree on the change of behavior.

DATA COLLECTION

At the end of the observation, the Observer will:

- Fill out an Observation Form with the safe and at-risk behaviors he noticed
- Record the date, time and location of the observations
- Note the workers comments and reasons for the at-risk behavior
- Record recommended safe behavior

The worker's name or identification number are not noted in the Observation Form.

- These Company forms will be used by MPC, Corp. to summarize the observation process. Recording this interaction is important for later detailed analysis by the committee in charge of the program
- Data gathering and the Observation Form will be gathered and entered into an electronic database. Reports will be generated for the committee to analyze at risk behavior trends
- Information taken from the observation and feedback phase of the program will be compiled in useful data and implemented in the action plan

ELEMENTS OF THE ACTION PLAN

In order to address unsafe behaviors MPC, Corp. will construct its Action Plan based on Observation Reports, trend analysis and recommendations from the Observers and employees. Tim Foster is responsible for the procedures of the Action Plan.

Action planning will include:

- Regularly scheduled meetings to analyze Behavior-based report findings
- Evaluating unsafe behaviors
- Designating responsible parties and time frames to complete the Action Plan
- Ensuring support of management

The committee will:

- Produce a set of recommendations to correct workers' behavior
- Recommendations may be as simple as providing Personal Protective Equipment (PPE) to workers in certain location, or increase work force in another location
- Some of the recommendations require site modification or costly machinery. Such recommendations are sent to top management for necessary approvals

The committee's responsibility is to ensure that recommendations will:

- Change the at-risk behaviors at the targeted location
- Eliminate hazards and risks caused by hardware or wrong design

FOLLOW-UP

Any Action Plans set out by MPC, Corp. at the direction of Tim Foster will be completed in a time frame agreed upon by the entire committee.

Regularly scheduled meetings will be held to:

- Assign responsibility for the completion of the Action Plan
- Ensure that the guidelines of the Action Plan are being carried out
- To document the Action Plan and its progress

Behavior-Based Safety Program Employee Training Form

I, _____, have read or been informed of the Behavior-Based Safety Program and its elements.

- ☐ I am aware of the companies Safe Work procedures including the Company's Code of Safe Practices.
- ☐ I understand I may be observed in my job performance or assigned task by a designated Observer and this person will inform me that I am being observed.
- ☐ I understand that the Observer will communicate to me the positive and At-risk behaviors I may display on completion of his/her observation.
- ☐ I agree to do my utmost to implement any of the Observers' recommendations they make in order to improve my performance and safety.
- ☐ I understand my cooperation and communication is key to the success of the Behavior-based program.
- ☐ I understand that the Observations of my job performance will not include my name or identifying mark and is used only for statistical information in the program.
- ☐ I agree to follow the procedures of any Action Plan as set out by the Company.

Employee Signature: _____

Date: _____

BBS Training Form

Company Name:		
Date of Training:		
Trainer's Name:		
Trainee:	☐ Initial Training	☐ Refresher Training
The trainee (observer) named above has been trained to observe the following jobs:		
Work Type/Job	Trained	Not Trained
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐
	☐	☐

I, _____, understand that my training in the above listed jobs qualifies me to observe employees while doing their job(s), conduct feedback with employee(s) and implement the established goals of the Behavior-based Safety Program. I have also displayed the required knowledge in the following areas:

- Knowing the BBS Program objectives
- How to conduct observations
- Knowledge of the jobs being observed
- The correct safety procedures of these jobs
- Filling out the Observation Form
- How to identify At-risk behaviors

Signature: _____ Date: _____

Observation Form

Observer Name:		Date:
Job being observed:		
Job Step	Procedure Comments	
	Positive Behaviors:	At-risk Behaviors
1		
Recommendations:		
	Positive Behaviors:	At-risk Behaviors
2		
Recommendations:		
	Positive Behaviors:	At-risk Behaviors
3		
Recommendations:		
	Positive Behaviors:	At-risk Behaviors
4		
Recommendations:		
Employee Comments:		

Observer's Signature _____ Date: _____

POLICY

MPC, Corp. has adopted the following program to ensure that short service employees are identified, appropriately supervised, trained, mentored and managed. This program is adopted in order to prevent accidents such as personal injury, injury to others, environmental damage, and/or property damage by the short service employee.

MPC, Corp. defines a short service employee (SSE) as any person or personnel with less than six (6) months experience in his/her current position or with one's current employer. A person or persons can also be classified as an SSE if they change jobs within the company they are working for or as a new hire for the same type of position for another company.

MPC, Corp. is responsible for ensuring that the following policy and safe work practices are enforced.

REFERENCES

Although OSHA has no specific requirements regulating short service employees, MPC, Corp. has adopted this policy for the general safety of its workers and will follow industry best practices.

RESPONSIBILITIES OF EMPLOYERS

- MPC, Corp. is responsible for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions
- Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves

RESPONSIBILITIES OF EMPLOYEES

- Employees are responsible for wholehearted, genuine operation with all aspects of the Safety and Health Program including compliance with all rules and regulations – and for continuously practicing safety while performing their duties

HAZARDS

High Hazard Areas

SSE's may be prohibited from entering and working in high hazard areas in certain situations, these may include:

- Naturally occurring radioactive material (NORM)
- H²S areas
- Confined spaces

PROCEDURES (SAFE PRACTICES)

Work Crew Assignments and Restrictions

- A single worker as his own crew is not considered an SSE
- Employees defined as SSE are not permitted to work alone
- When crew/group sizes of less than five (5) are assembled, no more than one (1) SSE per group/crew is allowed
- When working with crew/group sizes larger than five (5) members, the number SSE's will not exceed 20% of the crew/group make up.
- If the crew/group exceeds the twenty percent (20%) make up of SSE's, a written variance form is required, which will serve as a mitigation plan. This variance must be approved by the Supervisor and/or Manager in charge of the project

Communication and Notification

The processes for the proposed crew/group, when using an SSE, are outlined in the Short Service Employee Form. Prior to beginning the job assignment, the Supervisor/Manager in charge will submit the completed SSE form for all the jobs that will contain SSE personnel, to the project's coordinator, on-site supervisor, or contractor. The work owner or supervisor/person in charge will decide the SSE approval status and will keep the original completed form in the project files.

Identification

All SSE personnel must be visibly identified by employing one of the following methods:

- Wearing a high-visibility Hard Hat
- Wearing a high-visibility Vest
- Any method which clearly identifies the employee as an SSE to anyone onsite

Monitoring SSE's

Supervisor must monitor their workers, which includes the SSE personnel for Environmental, Health and Safety (EHS) awareness.

The identifier marking the SSE may be removed from the SSE Program at the discretion of the supervisor at the end of the required six-month period if the SSE has:

- Worked safely
- Adhered to all EHS policies
- Had no recordable incidents attributed to them

The supervisor will require the worker that fails to complete the six-month period free of recordable incidents, to get the operator to approve in writing prior to allowing the person to return to the operator's property.

Mentoring Process

All SSE's will be assigned a mentor for the first six (6) months of employment. A mentor's responsibility is to provide guidance and develop the SSE personnel. A mentor may be assigned only one (1) SSE per crew/group. The mentor must always be onsite with the SSE to monitor the SSE.

The mentor must meet the following requirements:

- Be familiar with the SSE's job, have the oversight responsibilities required, and all hazards accompanied with the job
- Have up to date orientation training
- Be familiar with all site policies, procedures, and any required specialized actions with the work to be done
- Show the ability to recognize any hazards and/or unsafe acts
- Are able and willing to challenge their personnel on the job if they do not meet site procedures, policies, or other requirements and will see that the stop work authority is enforced
- Participate actively in the behavior-based safety process

Note: A mentor must keep a helpful eye on new hire's in your crew. Take time to describe the layout of the project, the best method to access the work, or how to work a tool they have never used before.

Sub-Contractor Management

Sub-Contractors working on site will have assigned mentors that monitor their workers only. Mentoring of outside workers will be done on an individual basis, and as required. They will also be managed by this policy.

REQUIREMENTS

SSE Plan

MPC, Corp. has established this Short Service Employee (SSE) plan to verify all work is being carried out safely by requiring SSE supervisors to:

- Communicate the SSE policy and procedure at all pre-job meetings
- Submit the crew/group makeup and all SSE form(s) to the on-site representative of the work owner for approval
- Ensure the on-site representative validates the crew/group makeup and experience level
- See that the on-site representative approves the SSE variance form
- Make sure the on-site representative posts the forms to the appropriate database, if required

SSE Review

To ensure each Short Service Employee is progressing satisfactorily through the SSE program, the company shall document progress of each individual from start to completion.

Based on the unique characteristics of the assigned work of the SSE, a checklist shall be developed for each SSE employee with a record of milestone requirements met. These requirements, based on the unique assigned area, group or work, such as:

- Receiving the required safety orientation
- Attending the required safety trainings
- The SSE demonstrates ability to do the job required
- SSE can use tools/machines/equipment safely
- The ability to identify the hazards at the work site and how to protect one's self.

Additional key milestones shall be added

Program Review

This Short Service Employee Program will be reviewed on regular basis to ensure the practices are kept up to date by performing the following:

- Continuous monitoring of the SSE
- Ensuring all changes/updates to the forms are submitted prior to beginning work and whenever a change may occur thereafter

PPE

Short Service Employees shall be provided required PPE at the expense of the employer. SSE shall receive training in:

- PPE that is required in various locations
- How to inspect, don, doff clean and maintain required PPE

TRAINING

Short Service Employees shall be properly trained in the knowledge and skills necessary to conduct their assigned jobs safely and efficiently.

Training shall include:

- Federal, state, industry, and company requirements
- Hazard(s) present in the workplace.
- The policies, procedures, processes, utilized to control these hazards and prevent illnesses, injuries, property damage and/or environmental incidents.
- The proper use of PPE and all its requirements

CONTRACTOR SHORT-SERVICE EMPLOYEE FORM & VARIANCE

A supervisor must complete and submit this form to work owner supervision for approval prior to arrival on location. The work owner supervision must approve the individual SSE before he/she arrives on location.

I. SSE Information			
Contractor Company Name		Request Date	
SSE Name		Date of Employment	
Current Job Title			
Years Related Experience	Years	Experience in Current Position	Years Months
Is this worker in compliance with your Substance Abuse Policy?			☐ Yes ☐ No
Have site owner, contractor, and HES policies (including Stop Work Authority) been reviewed with SSE?			☐ Yes ☐ No
Who has been assigned as the SSE's mentor?			
Mentor's experience			Years Months
List all training provided to the SSE		List any previous special training	
SSE(s) identified by: ☐ Hard Hat -High Visibility ☐ Vest -High Visibility			
☐ Other:		Color:	

CONTRACTOR SHORT-SERVICE EMPLOYEE FORM & VARIANCE (PAGE 2 OF 3)**II. SSE Crew Composition Requirements**

Choose one of the crew types below. If any of the stated limitations are exceeded, proceed to the variance form on next page.

☐ Single person crew-cannot be an SSE (Variance Required)

☐ 2-4-person crew-no more than one SSE

☐ 5 or more-person crew-no more than 20% SSE(s) per crew

☐ Exceeding 20% SSE per crew (Variance Required)

III. SSE Review and Approval

☐ Contractor Supervising Manager

Date

☐ CPL Work Location Supervisor

Date

☐ Work Owner

Date

IV. Contractor SSE Form Repository

☐ CSM Data Base

Date

☐ CPL Work Location

Date

☐ Work Owner File

Date

CONTRACTOR SHORT-SERVICE EMPLOYEE FORM & VARIANCE (PAGE 3 OF 3)

This form is to be filled out whenever the conditions on this form or any other element of the Short Service Employee Policy cannot be met.

IV. SSE Variance			
Variance Justification (What are the current circumstances and what will be done to ensure an acceptable level of risk?)			
Alternatives to Variance (If the variance is denied, what are the alternatives to completing the scope of the work? Briefly detail the cost and operational impact of the alternatives.)			
List the steps to be taken to manage/mitigate the SSE risk to an acceptable level:			
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
V. Variance Review and Approvals			
Variance Expiration Date			
Contractor Manager/Supervisor			☐ Approves ☐ Denies
Signed		Date	
Work Owner's On-Site Representative			☐ Approves ☐ Denies
Signed		Date	
Note: For large jobs, please use a separate sheet to list all SSEs on the crew by name and job title.			

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. has implemented this program to ensure employees are informed of the chemical hazards of Ammonia in their workplace.

Tim Foster is the administrator of the Ammonia Awareness Program, and will document all necessary training of employees. Employees will be trained at the time of initial hiring in the safe use and handling of Ammonia they are required to use on the job.

Employees will be notified of any Ammonia used by any company other than MPC, Corp. in the workplace and make Safety Data Sheets (SDS) available to employees.

RESPONSIBILITIES

We recognize that the responsibilities for safety and health are shared:

- MPC, Corp. accepts the responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions
- Supervisors are responsible for developing the proper attitudes toward safety and health in themselves and in those they supervise, and for ensuring that all operations are performed with the utmost regard for the safety and health of all personnel involved, including themselves
- Employees are responsible for wholehearted, genuine operation with all aspects of the Safety and Health Program including compliance with all rules and regulations – and for continuously practicing safety while performing their duties

LEGAL STANDARDS

The OSHA standard for ammonia 50 parts per million (ppm) over an 8 hour day. MPC, Corp. ensures that a worker's exposure will not exceed an average of 50 ppm over their 8 hour shift.

Most people can smell ammonia when it reaches a concentration of 20 to 30 ppm. Do not depend on your nose to tell you your workplace is safe. Ammonia may dull your sense of smell so that after a few minutes you cease to notice it.

AMMONIA

Ammonia is a colorless gas with a strong, irritating smell. It is widely used as a refrigerant in meatpacking, poultry, and other food processing plants.

At room temperature ammonia is a colorless, flammable gas with a pungent, suffocating odor. It becomes a clear, colorless liquid under increased pressure. Ammonia is usually shipped as a compressed liquid in steel cylinders. Anhydrous ammonia is the form used primarily in refrigeration and agriculture. Ammonia dissolves in water to form ammonium hydroxide, a corrosive solution. Concentrations of ammonium hydroxide vary from 5 percent to 10 percent for household use and 25 percent or more for industrial use.

Examples of ammonia on the job

Some examples of ammonia exposure on the job can include:

- Working on/near industrial refrigeration machinery rooms, equipment and/or piping
- Working in petroleum refineries
- Working with/near agricultural fertilizer

As a liquefied gas, ammonia is flammable. Sources of ignition usually include smoking or flames. Ammonia is considered a strong oxidizer. It is the determination of MPC, Corp. that steps shall be taken to separate ammonia and ammonia products from incompatible materials, such as:

- Copper
- Brass
- Bronze
- Galvanized steel
- Tin
- Zinc

If a fire occurs in the immediate vicinity of ammonia cylinders, remove them promptly if it can be done safely. If removal is not possible, cool cylinders by spraying with water. Do not extinguish flames as explosive re-ignition may occur. Allow the fire to burn out. If the fire cannot be brought under control, evacuate the area because of explosion hazards and toxic fumes.

Proper Handling and Storage

MPC, Corp. will train all employees before working with ammonia, employees shall be trained in its proper handling and storage and know how to use the proper personal protective equipment.

It is the determination of MPC, Corp. that ammonia must be stored in a cool, dry, well-ventilated area in tightly sealed containers protected from exposure to weather, extreme temperature changes, and physical damage.

Ammonia should be separated from:

- Oxidizers
- Combustible materials
- Heat, sparks, and open flame

Hazards of Ammonia

Ammonia leaks can be very dangerous. These leaks in the refrigeration pipes carrying ammonia to the coolers can endanger all workers in your plant; therefore, it is important to make sure you are protected when one occurs!

Ammonia is extremely irritating, and may severely burn your skin and eyes upon contact. If inhaled during a leak, a cloud of ammonia gas causes burning and swelling of the air passages of the nose, throat and lungs. Workers exposed to very serious leaks may survive the accident, but may die later from pulmonary edema, a buildup of fluid in the lungs caused by the damaging effect of the gas. Workers may suffer permanent lung and eye problems as a result of exposure to high levels of ammonia.

Exposure of the eyes to ammonia may cause burning, tearing, temporary blindness and severe eye damage. Exposure of the skin to ammonia may cause severe burns and blistering. Exposure of the respiratory tract (mouth, nose and throat) to ammonia may cause runny nose, coughing, chest pain, severe breathing difficulties, severe burns and death.

Nausea and water eyes from ammonia fumes pose an additional safety hazard to workers who must work with sharp knives and precision cutting equipment.

Not much is known about the long-term effects of ammonia. Frequent exposure to small amounts of other irritating gases can lead to bronchitis, persistent cough, and excess mucus production. It may also decrease your body's ability to get rid of foreign substances, like dusts, from your airways. Chronic (long-term) exposure to ammonia may, therefore, harm you by itself or in combination with other occupational hazards and infectious diseases.

Controlling the Hazards

MPC, Corp. ensures that all ammonia areas shall be well-ventilated and posted with warning signs. Emergency exits shall be well-marked and easy to get to. All ammonia tanks, lines, valves, and cylinders should be labeled, inspected frequently for leaks, maintained in a safe condition, and protected from trucks, forklifts, and other moving machinery.

Employees shall never rely on respirators for day-to-day protection, but they should be available for emergencies. Keep them close to the work area they are useless in the plant manager's office. Never enter a confined space which might contain ammonia without an air-line respirator, a safety line, and a back-up worker with the same equipment.

MPC, Corp. shall require employees wear provided impervious clothing, gloves, face shields, and goggles available if there is a possibility of skin contact with liquid ammonia or vessels containing liquid anhydrous ammonia or aqueous solutions of ammonia containing more than 10% by weight of ammonia. Never wear contact lenses near ammonia they can trap the ammonia against your eyes.

Workers exposed to ammonia shall have yearly medical exams by doctors of their own choosing--not by the company doctor. MPC, Corp. shall pay for the exams. Workers with lung, heart, or eye problems should be transferred to areas free from ammonia without loss of pay or other rights.

MPC, Corp. shall keep records of ammonia use, accidents involving ammonia, and maintenance of ammonia equipment. The records shall be available to workers. All workers in ammonia areas shall receive training in safe work practices, including drills for escape in case of accidents. Workers trained in first aid should always be on hand.

Site Specific Contingency / Emergency Plans

MPC, Corp. will provide all employees with a prepared site specific contingency/emergency plan. This plan will include where ammonia is used in the host facility and additional plant safety rules.

First Aid

MPC, Corp. shall take these prompt actions if there is an ammonia spill or leak:

1. Remove the exposed person(s) to fresh air
2. Call 911 immediately and notify MPC, Corp.
3. If the victim is contaminated with ammonia follow the steps for decontamination prior to administering first aid
4. If the victim is not breathing, begin artificial respiration
5. If the victim is breathing, place them in a seated position or lying down with the head and upper body in an upright position. Encourage slow, deep, regular breaths. Have a health professional administer oxygen as soon as possible
6. Keep the person warm and quiet
7. Seek medical attention. Persons with serious symptoms may need to be hospitalized

IN CASE OF AN AMMONIA LEAK

When a release of ammonia is detected, MPC, Corp. shall monitor the air with a direct reading device. If employees are not evacuated, air monitoring should be conducted during the entire release of ammonia. Initially, readings should be taken every five minutes. If an air monitoring reading, taken by direct reading method, detects ammonia at or above 25 ppm, employees will be evacuated from the affected area.

In case of emergency or a major leak, or if employees complain of health effects, call the fire department. MPC, Corp. shall not wait for air monitoring, but should immediately evacuate employees from the area. Employees not fully protected with appropriate personal protection equipment should not re-enter the area until air-monitoring indicates the ammonia level has fallen below 25 ppm and a second reading indicates that the level is falling.

The "Emergency Response Standard" issued by OSHA contains special protections for those-workers required to assist in dealing with a leak. See the UFCW fact sheet, "Protection from Ammonia Leaks: The Emergency Response Standard," for more information.

NOTE: Many companies have adopted a short-term level of 25 ppm as an evacuation trigger, though it is lower than the 50 ppm OSHA standard. This is a precautionary measure to prevent levels from exceeding the OSHA standard.

Decontamination

Clothing or skin that is soaked with ammonia solutions may be caustic and expose rescuers, as well as victims, to vapors. To decontaminate:

1. Remove soaked clothing from the victim and double-bag it immediately
2. Flush exposed skin and hair with soap and water for 15 minutes, call a physician, and seek medical attention immediately if frostbite has occurred. Do not wash or rub skin
3. Flush exposed or irritated eyes with water or saline for 15 minutes. If the person is wearing contact lenses, try to remove them. See a physician/ophthalmologist immediately
4. For ingested ammonia, give the victim at least 2 glasses of water or milk immediately. Refer to SDS and call poison control center (1-800-848-6946), or call physician on instructions inducing vomiting

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TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. is committed to the safety and health of our employees and to preventing the spread of bloodborne pathogens by eliminating occupational exposure to blood and other potentially infectious materials (OPIM). Therefore, MPC, Corp. adheres to the following bloodborne pathogen policy and Exposure Control Plan (ECP).

To eliminate occupational exposure to OPIM, all employees will follow the policy of universal precautions, which is assuming all blood and body fluids are infectious and taking the necessary precautions to not contact them without the proper personal protective equipment (PPE), and properly disinfecting themselves and the environment afterwards.

This written exposure control plan will be available to all employees that request it.

If employees — such as those designated as responsible for first aid and medical assistance, or those doing work in certain medical or sanitation facilities — are exposed to bloodborne pathogens, all measures within this program will be taken to prevent the spread of disease.

Tim Foster is responsible for evaluating the effectiveness of the program and maintaining all records.

RESPONSIBILITIES

Employer Responsibilities

- Enact and enforce an exposure control plan to prevent occupational exposure to potentially infectious materials
- Identify employees who may reasonably be anticipated to come into contact with blood and other potentially infectious materials
- Provide for post-exposure evaluation and follow-up should an employee be exposed to potentially infectious materials
- Ensure employees receive appropriate bloodborne pathogens training
- Ensure an adequate supply of Personal Protective Equipment
- Ensure that all records required by this section shall be made available upon request of employees, Assistant Secretary & the Director for examination & copying. Medical records must have written consent of employee before being released

Safety Committee Responsibilities

- Develop and implement a site-specific exposure control plan
- Identify employees who may reasonably be anticipated to come into contact with blood and other potentially infectious materials
- Develop, conduct, and document training for bloodborne pathogens safety
- Investigate exposure incidents and recommend work-practice changes
- Make exposure determinations without regards to the use of (PPE)
- Recommend personal protective equipment (PPE), if necessary

Employee Responsibilities

- Offer input on ECP as appropriate, including identification, evaluation, and selection of new control methods
- Follow all elements of the bloodborne pathogens policy and training
- Notify a supervisor if they encounter any problems or concerns related to this policy

TRAINING

MPC, Corp. will ensure employees who may reasonably be exposed to potentially infectious materials participate in a BBP training program. MPC, Corp. will provide this training at no cost to the employee during working hours.

Training will be provided: at the time of assignment to/prior to working on tasks where occupational exposure may take place; and at least annually. MPC, Corp. will provide additional training when tasks or procedures are added or changed that affect the employee's occupational exposure. It is acceptable for additional training to be limited to addressing only the changes or additions to the employees' exposure. MPC, Corp. will use only training material that is appropriate in content and vocabulary to educational level, literacy, and language of employees.

Training Components

The training program will contain, at a minimum, the following elements:

- An accessible copy of the regulatory text of CFR 1910.1030, this bloodborne pathogen policy and exposure control plan, and an explanation of its contents
- A general explanation of the epidemiology and symptoms of bloodborne diseases
- An explanation of the modes of transmission of bloodborne pathogens
- An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials
- An explanation of the use and limitations of methods to prevent or reduce exposure, including engineering controls, work practices, and personal protective equipment
- Information on the types, proper use, location, removal, handling, decontamination, and disposal of personal protective equipment
- An explanation of the basis for selection of personal protective equipment (PPE)
- Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge to employees who face occupational exposure
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials
- An explanation of the procedures to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available
- Information on the post-exposure evaluation and follow-up that the employer is required to provide for the employee following an exposure incident
- An explanation of the applicable signs, labels, and/or color coding
- An opportunity for interactive questions and answers with the person conducting the training session
- The person conducting the training will be knowledgeable in the subject matter of the training program as it relates to the workplace

Training Records

Tim Foster is responsible for maintaining all MPC, Corp. training records Training records will include the following information:

- Dates of the training sessions
- Contents or a summary of the training sessions
- Names and qualifications of persons conducting the training
- Names and job titles of all persons attending the training sessions
- Employee training records will be maintained for three years from the date on which the training occurred

SAFE PRACTICES

Exposure Determination

It is crucial to determine which jobs expose an employee to blood and other potentially infectious material, as well as the means by which that exposure might occur. Accordingly, the MPC, Corp. safety committee or management will determine which job classifications can reasonably expect occupational exposure to potentially infectious material. The following will be determined and documented:

- Job classifications in which all employees have occupational exposure
- Job classifications in which some employees have occupational exposure
- Tasks and procedures in which occupational exposure occurs
- Further, input from non-managerial employees exposed to contaminated sharps and infectious material is vital to the success of this exposure control plan, and every employee is encouraged to offer suggestions that will help the effectiveness of the exposure control plan

Methods of Compliance

All body fluids will be treated as infectious and employees will take steps against contact.

Engineering and Work Practice Controls

As part of this exposure control plan, MPC, Corp. will seek methods to eliminate occupational exposure to the greatest extent possible. MPC, Corp. will examine regularly, and maintain or replace, engineering controls to ensure their effectiveness.

Handwashing

- MPC, Corp. will provide accessible handwashing facilities to every employee. If providing handwashing facilities is not feasible, MPC, Corp. will provide antiseptic towelettes or an appropriate antiseptic hand cleanser in conjunction with clean cloth/paper towels
- For construction projects, employers must: provide onsite general washing facilities (one per 20 employees), keep them in sanitary condition, and provide suitable cleaning agents/towels for the removal of hazardous and other substances

- In addition to basic workplace hygiene requirements, employees will wash their hands as soon as possible after removing gloves or other PPE
- Should an employee's skin or mucous membrane be exposed to potentially infectious materials, the employee will immediately wash their skin with soap and water or flush their mucous membranes with water

Sharps

- Employees will handle and dispose of contaminated sharps in a way that prevents unnecessary exposure to hazards. Employees will not bend, recap, or remove contaminated sharps unless no alternative is feasible and it can be done using a mechanical device or one-handed technique
- As soon as possible after use, contaminated reusable sharps will be placed in a container that is: puncture resistant, labeled or color-coded appropriately, leak-proof on the sides and bottom, and made so employees can't reach into it

Other Engineering and Work-Practice Controls

- Don't store food or drink, eat, drink, smoke, apply cosmetics or handle contact lenses near possible exposures
- Employees may not use their mouths to suck up potentially infectious materials
- Containers used to store or transport potentially infectious materials should be closable, prevent leaks, be appropriately labeled or color-coded, and puncture resistant
- Employees will examine any equipment that may be contaminated before servicing or shipping, and will decontaminate it as necessary and feasible. If decontamination is impossible, the employee will attach a label to the equipment, and inform all appropriate personnel of the contamination to ensure they take proper precautions

Personal Protective Equipment (PPE)

- When there is occupational exposure, the employer shall provide, at no cost to the employee, appropriate personal protective equipment. The employer shall ensure that PPE is used unless the employee temporarily and briefly declined to use PPE in rare circumstances. The employer shall repair or replace PPE as needed to maintain its effectiveness.
- Appropriate PPE is impermeable to blood or OPIM under normal conditions and durations
- PPE will be provided and maintained free to employees in appropriate sizes, and provisions will be made should an employee be allergic to gloves normally provided
- An employee may decline using appropriate PPE under "rare and extraordinary circumstances" when PPE use might prevent the delivery of health care or public safety services. These exceptions will be investigated and documented to prevent future occurrences
- PPE will be removed as soon as feasible before leaving the general work area. After removal, the employee will place contaminated PPE in an appropriate area or container to be stored, washed, decontaminated, or disposed of

Gloves

Employees must wear gloves if they anticipate hand contact with OPIM. Do not reuse single-use gloves, and replace as quickly as possible if torn, punctured, or compromised.

Masks, Eye Protection, and Face Shields

Employees will wear masks, together with proper eye-protection devices whenever splashes, spray, spatter, or droplets of blood or other potentially infectious materials may be generated and eye, nose, or mouth contamination can be reasonably anticipated.

Gowns, Aprons, etc.

Employees will wear appropriate protective clothing like gowns or clinic jackets when appropriate; the type of protective clothing is determined by the nature of exposure, and will be sufficient to protect against occupational exposure.

Housekeeping

All equipment shall be cleaned and decontaminated after contact with blood or other potentially infectious materials.

Employees will use an appropriate disinfectant to clean and decontaminate contaminated or potentially contaminated work surfaces after any spill of infectious materials, and at the end of the work shift. MPC, Corp. will replace protective surface coverings as soon as possible if they are contaminated. Bins, cans, pails or other receptacles that may become contaminated should be inspected and decontaminated regularly, in addition to being decontaminated as soon as feasible after visible contamination. Employees must not pick up, by hand, any broken glassware that may be contaminated. Use a brush/dustpan or tongs.

Employees will keep the workplace clean and sanitary. MPC, Corp. will implement a written schedule for cleaning and decontamination based on the demands of the site.

MPC, Corp. will replace protective surface coverings as soon as possible if they are contaminated. Bins, cans, pails or other receptacles that may become contaminated should be inspected and decontaminated regularly, in addition to being decontaminated as soon as feasible after visible contamination. Employees must not pick up, by hand, any broken glassware that may be contaminated. Use a brush/dustpan or tongs.

Laundry

All equipment and laundry shall be cleaned and decontaminated after contact with blood or other potentially infectious materials.

Employees will handle any contaminated laundry as little as possible. They must put such laundry into a color-coded or labeled container at the site where it was used. Wet laundry should be placed into a leak-proof container. Employees handling contaminated laundry must use appropriate PPE. Employees must never take or wear contaminated clothing outside of the work site.

HEPATITIS B VACCINATION

MPC, Corp. will make available the hepatitis B vaccination series at no cost to any MPC, Corp. employee who faces occupational exposure. If not vaccinated, employees will be informed of the opportunity to be vaccinated within 24 hours of an exposure incident.

An employee occupationally exposed to potentially infectious material may decline the hepatitis B vaccine, but must sign a declination statement to be kept on file. Anyone who declines vaccination may request and receive the vaccination later at no cost.

Medical records relating to employees' hepatitis B vaccination status and post-exposure evaluation and follow-up must be kept for 30 years plus the duration of employment.

POST-EXPOSURE EVALUATION AND FOLLOW UP

Should an exposure incident occur, the employee should contact Tim Foster (or designate) immediately.

In Case of Exposure

A licensed health care professional will conduct a confidential medical evaluation and follow-up, and will provide a medical opinion on diagnosis/course of action, as soon as possible following an exposure incident. After administering initial first aid (cleaning the wound, flushing the eyes or other mucous membranes, etc.), follow the procedure below:

1. Document the routes of exposure and how the exposure occurred
2. Identify and document the source individual (unless the employer can establish that identification is infeasible or prohibited by state or local law)
3. Obtain consent and arrange to have the source individual tested as soon as possible to determine human immunodeficiency virus (HIV), hepatitis C virus (HCV), and hepatitis B virus (HBV) infectivity; convey and document conveyance of the source individual's test results to the employee's health care provider. If the source individual is known to be HIV, HCV, and/or HBV positive, new testing is not necessary
4. Provide the exposed employee with the source individual's test results and with information about applicable disclosure laws and regulations concerning the identity and infectious status of the source individual (e.g., laws protecting confidentiality)
5. After obtaining consent, collect the exposed employee's blood as soon as feasible after an exposure incident, and test the blood for HBV and HIV serological status. This will establish a baseline for periodic testing over the next six months. Depending upon the circumstances of the exposure, post-exposure prophylaxis may be recommended to reduce the risk of infection from HIV or HBV
6. If the employee does not give consent for HIV serological testing during collection of blood for baseline testing, preserve the baseline blood sample for at least 90 days; if the exposed employee elects to have the baseline sample tested during this waiting period, perform testing as soon as feasible

Administrative Responsibilities Following Exposure

MPC, Corp. will ensure that the health care professional responsible for post-exposure evaluation and follow-up receives the following:

Counseling

MPC, Corp. will ensure that post-exposure counseling will be given to employees following an exposure incident. Counseling should include Centers for Disease Control and Prevention (CDC) recommendations for prevention and transmission of bloodborne infections including HIV, HBV, and HCV. Counseling must be made available regardless of the employee's decision to accept serological testing.

RECORDKEEPING

Medical Records

MPC, Corp. will maintain a confidential medical record for every employee with occupational exposure that will include at least the following:

- Name and social security number of the employee
- Copy of the employee's HBV status (with dates of all Hep B vaccinations)
- Copy of all post-exposure documentation and healthcare professional's written opinion
- Copy of the information provided to the healthcare professional
- Do not share or report this record unless the employee provides written consent

Tim Foster is responsible for maintaining all MPC, Corp. medical records.

Sharps Injury/Exposure Incident Log

A Sharps Injury Log is a record of each exposure incident involving a sharp. The purpose of the Sharps Injury Log is to generate a record of exposure incidents that will include enough information about the cause of the incidents to allow the company to analyze them and take preventive action.

The Sharps Injury Log must include:

- The date and time of the sharps-related exposure incident
- The type and brand of the sharp involved in the incident
- A description of the incident including:
 - The job classification of the exposed employee
 - The department or work area where the incident occurred
 - The procedure being performed
 - How the incident occurred
 - The body part injured
 - For sharps with engineered sharps injury protection (ESIP), if the safety mechanism was activated
 - If the incident occurred before action, during activation or after activation of the mechanism; for sharps without ESIP, the employee's opinion if ESIP could have prevented the injury

Sharps injuries/exposures must be recorded on the log within 14 working days of when the incident was reported to the employer.

The Sharps Injury Log must be maintained for five years from the date of the occurrence of the exposure incident.

HAZARD COMMUNICATION

Label containers of regulated biological waste, any container used to store or transport potentially infectious material, as well as contaminated equipment, to prevent exposure. Labels for such containers will include the legend depicted in Figure 1.

All such labels will be fluorescent orange or orange-red and be attached on, or as close as feasible to, the container.



Figure 1

REVIEW AND UPDATE OF EXPOSURE CONTROL PLAN (ECP)

The MPC, Corp. safety committee will review this ECP and update it at least annually, and whenever necessary, to reflect new or changed tasks and procedures that affect occupational exposure.

Reviews and updates will:

- Reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens
- Document the annual consideration and implementation of effective medical, and commercially available, devices and services designed to eliminate or minimize occupational exposure

MPC, Corp. will seek the input of non-managerial employees to identify, evaluate, and select controls to reduce occupational exposure. This input will be documented as part of this ECP.

ATTACHMENTS

- Exposure Control Plan Documentation
- Declination Statement
- Exposure Incident Report
- Evaluating Physician's Written Opinion
- Sharps Injury Log

These forms may be reproduced for the purposes of implementing and maintaining a safety and health program.

EXPOSURE CONTROL PLAN DOCUMENT FORM

Exposure Determination	
Jobs in which all employees have occupational exposure to potentially infectious materials	Task or procedure where exposure occurs
Jobs in which some employees have occupational exposure to potentially infectious materials	Task or procedure where exposure occurs
Engineering controls and work practice controls:	
The following types of PPE are available in the following locations:	
Personal Protective Equipment	Location

HEPATITIS B DECLINATION STATEMENT FORM**DECLINATION STATEMENT**

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

Employee Signature:

Date:

DECLINATION STATEMENT

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

Employee Signature:

Date:

DECLINATION STATEMENT

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

Employee Signature:

Date:

EXPOSURE INCIDENT REPORT FORM

(Routes and Circumstances of Exposure Incident)—Please Print				
Employee's Name			Date	
Date of Birth		SS#		
Telephone (Business)			(Home)	
Job Title				
Date of Exposure		Time of Exposure		AM PM
Hepatitis B Vaccination Status				
Location of Incident				
Describe job duties you were performing when the exposure incident occurred				
Describe the circumstances under which the exposure incident occurred				
What happened that resulted in the incident?				
What body fluid(s) were you exposed to?				
What was the route of exposure? (e.g., mucosal contact, contact with non-intact skin, percutaneous)?				
Describe any personal protective equipment in use at time of exposure incident				
Did PPE fail?		If yes, how?		
Identification of source individual(s) (names)				
Other pertinent information				

EVALUATING PHYSICIAN'S WRITTEN OPINION FORM

To the Evaluating Physician:

This employee may have suffered an exposure incident to a Bloodborne Pathogen. In accordance with OSHA standards covering post-exposure evaluation and follow up, the following documents are provided for you:

- A copy of OSHA regulations covering Occupational Exposure to Bloodborne Pathogens
- A description of the exposed employee's duties as they relate to the exposure incident
- Documentation of the routes of exposure and circumstances under which exposure occurred
- Results of the source individual's blood testing, if available
- All medical records relevant to this employee's appropriate treatment, including vaccination status

After you have determined whether there are contra-indications to vaccination of this employee with Hepatitis B vaccine, please state in the space below if:

Vaccine was indicated		Vaccine was received	
-----------------------	--	----------------------	--

(All other findings are to remain confidential and are not to be included on this page.)

Please return this sheet to this employee.

Thank you for your evaluation of this employee.

Physician's Name (printed)		Date	
Physician's Signature			

SHARPS INJURY LOG

Facility/Location				Year	
Address					
City		State		ZIP	
Date	Time	Type, Brand, Model of Sharp Device	Department/ Work Area	Description of How Incident Occurred	

(RETAIN AT LEAST 5 YEARS)

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

The compliance of all employees with MPC, Corp. Safety and Health Program is mandatory and shall be considered a condition of employment. All safety rules, procedures, and plans in effect are to be followed as specified in the safety program. Employees found to be in violation of Company safety policy may be subject to penalty.

RESPONSIBILITIES

Tim Foster is the supervisor for disciplinary actions and any employee in a position of management or supervisory capacity may initiate disciplinary action against any employee found to be in violation of Company policy. Not following verbal or written safety procedures, guidelines, rules, horse play, failure to wear selected Personal Protective Equipment (PPE), abuse of selected PPE, and etc. constitutes a safety violation.

TRAINING

The importance of safe work practices and the consequences of failing to abide by safety rules will be covered in the New Employee Safety Orientation and at Tailgate/Toolbox Safety Training. This will help ensure that all employees understand and abide by The Company's safety policies.

Employees that are observed performing unsafe acts or not following proper procedures or rules will be retrained by their foreman or supervisor. A Safety Contact Report may be completed by the supervisor to document the training. If multiple employees are involved, additional safety meetings will be held.

PROCEDURES

The following outlines the disciplinary measures which will be taken against employees found to be in violation:

Periodic safety inspections of the workplace and equipment will be undertaken to ensure that all personnel, including supervisory positions, are demonstrating the required commitment to safety. A general neglect of safe work procedures, practices, and requirements in the workplace, or neglect of equipment safety, will be viewed as a lack of supervisory enforcement of safety policy and the appropriate supervisor/management personnel will be subject to the same disciplinary procedures described below.

These programs will be used for employee compliance with the safety program and all safety rules: training programs; retraining; optional safety incentive programs; disciplinary action.

Safety Incentive Programs

Although strict adherence to safety policies and procedures is required of all employees, The Company may choose to periodically provide recognition of safety-conscious employees and jobsites without accidents through a safety incentive program.

Disciplinary Action

The failure of an employee to adhere to safety policies and procedures established by MPC, Corp. can have a serious impact on everyone concerned. An unsafe act can threaten not only the health and well-being of the employee committing the unsafe act but can also affect the safety of his/her coworkers and/or customers. Accordingly, any employee who violates any of The Company's safety policies will be subject to disciplinary action.

When a "Safety Violation Notice" is issued, appropriate supervisory personnel will meet with employee(s) to discuss the infraction and inform individual(s) of the rule or procedure that was violated and the corrective action to be taken.

Note: Failure to promptly report any on-the-job accident or injury, on the same day as occurrence, is considered a serious violation of The Company's Code of Safe Practices. Any employee who fails to immediately report a work-related accident or injury, no matter how minor shall be subject to disciplinary action.

Employees will be disciplined for infractions of safety rules and unsafe work practices that are observed, not just those that result in an injury. Often, when an injury occurs, the accident investigation will reveal that the injury was caused because the employee violated an established safety rule and/or safe work practice(s).

In any disciplinary action, the foreman should be cautious that discipline is given to the employee for safety violations, and not simply because the employee was injured on the job or filed a Workers' Compensation claim.

Violations of safety rules and the Code of Safe Practices are to be considered equal to violations of other Company policy. Discipline for safety violations will be administered in a manner that is consistent with The Company's system of progressive discipline. If, after training, violations occur, disciplinary action will be taken as follows:

1. Oral warning. Documented, including date and facts on the "Safety Warning Report" form. Add any pertinent witness statements. Restate the policy and correct practice(s)
2. Written warning. Retrain as to correct procedure/practice
3. Written warning with suspension
4. Termination

As in all disciplinary actions, each situation is to be carefully evaluated and investigated. The particular step taken in the disciplinary process will depend on the severity of the violation, employee history, and regard to safety. Foremen and superintendents should consult with the office if there is any question about whether or not disciplinary action is justified. Employees may be terminated immediately for willful or extremely serious violations. Union employees are entitled to the grievance process specified by their contract.

Note: Consistency in the enforcement of safety rules shall be exercised at all times.

Employee Safety Warning Report

Employee's Name:		Position:	
Date of Warning:	Violation Time:	☐ am ☐ pm	Violation Date:
Supervisor:		Department:	
Type of Warning:	☐ Verbal	☐ Written	☐ Serious ☐ Other
Type of Violation:	☐ Unsafe Act	☐ Improper Safety Attire	☐ Unsafe condition ☐ Other
Supervisor's Statement:			
Employee's Statement: (Check Proper Box)			
☐ I agree with the Supervisor's statement. ☐ I disagree with the Supervisor's statement because:			
List all previous warnings and retraining below.			
When warned and by whom:		I have read and understand this warning decision.	
First Warning: (Describe reason)			
Date:	Date retrained:	Employee's Signature: Date:	
Second Warning: (Describe reason)		Supervisor's Signature: Date:	
Date:	Date retrained:	Copy Distribution:	
Third Warning: (Describe reason)			
Date:	Date retrained:	☐ Employee	
		☐ Employee's Supervisor	
		☐ Personnel Department	
		☐ Safety Committee	
The Supervisor must complete this form immediately after the employee has been interviewed. A decision must be made on the following to ensure violators <u>will not</u> participate in the current safety incentive program.			
☐ No further action ☐ Suspension ☐ Other:			
☐ Suspension from current safety incentive program ☐ Dismissal			
Submit this form for review at the next Safety Committee meeting.			
Safety Committee Notes:			

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

It is the policy of MPC, Corp. that training in first aid response is not a requirement for employment, but that local Emergency Medical Services are utilized for emergency medical care. Tim Foster is designated as the administrator of the Medical Services Program.

- Medical services for employee evaluations, employment requirements, and special conditions of work are provided to employees at no cost as specified in OSHA requirements
- A person(s) who has a valid certificate in first aid training, the American Red Cross, or equivalent will be available at work sites to render emergency first aid
- Provisions will be made prior to commencement of a project for prompt medical attention in case of serious injury
- First aid supplies will be easily accessible when required
- Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service will be provided
- Tim Foster is the designated first aid provider and certified in cardiopulmonary resuscitation CPR and is responsible for rendering first aid in the event of an injury requiring immediate response when emergency medical services are not available, and will also be responsible for first aid training of any employee required
- Injured employees are to be transported to medical facilities by emergency medical services. If emergency medical service is not available in a timely manner, the injured employee will be transported to the nearest medical service in a company vehicle by the job foreman
- In areas where 911 service is not available employees will be notified of phone numbers to contact local emergency response medical services. Tim Foster will be responsible for posting of emergency phone numbers at all jobsites. The phone numbers will be conspicuously posted in all work locations
- Tim Foster is responsible for the accessibility of First Aid Kits and for checking the contents of all First Aid Kits before being sent out to each job and at least weekly on each job to ensure that the expended items are replaced
- A valid certificate in first aid training must be obtained from the the American Red Cross or equivalent training that can be verified by documentary evidence
- First aid kits are readily available in all company vehicles and in the company office. First aid kits will consist of appropriate items and stored in a weather proof container with individual sealed packages of each type of item and will stock a minimum of the following items:

- | | |
|---|--|
| <ul style="list-style-type: none"> • PPE for First Aid: • 3-Pair latex gloves • Surgical masks • Clear eye protection or Face Shield • Dust Masks or other needed Face Protection • Mouth-to-mouth barrier • Large, sterile gauze pads (6 each: 2X2's, 3X3's, and 4X4's) • Compress Dressings (4X8), 3 each • Rolled gauze bandages: 2" and 3" wide, 3 each • Large box assorted "Band-Aids" • Two elastic wrap bandages (ace) • Cotton balls and Q-tips • Surgical or athletic tape; 1" and 2" wide, 2 rolls each | <ul style="list-style-type: none"> • Antiseptics and ointments: <ul style="list-style-type: none"> ○ Alcohol ○ Burn gel or cream ○ Alcohol swabs ○ Peroxide ○ Antiseptic spray and ointment • Pain relief tabs • 6 burn treatment single-use packages, 0.5 g. Application • Good quality eye-wash solution, with eye cup • 1 eye covering bandages (for two eyes) • Self-activating cold packs, 4x5 inches • Liquid antiseptic hand soap • Blunt-nose surgical scissors • Forceps, tweezers and safety pins • Snake-bite kit |
|---|--|

* General First-aid Guidebook, textbook, or manual will be readily available, but not necessarily inside of the first-aid kit.

- Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities will be provided within the work area for quick drenching or flushing of eyes or body
- Eye wash bottles are available wherever eye wash stations are not available, for any employee required to work in an environment where exposure to eye hazards may exist. Wash facilities or drench barrels are available at each jobsite for employees
- Procedure for flushing eyes — Eye membranes absorb chemicals quickly. This can lead to eye damage within minutes. Flood the eye with lukewarm (never hot) water poured from a large glass two to three inches from the eye. Continue for 15 minutes. Blink the eye as much as possible during the flooding. Do not force the eyelid open and do not allow the eyes to be rubbed. If lukewarm water is not available, rinse the eye quickly using a gentle stream from a hose for at least 15 minutes
- Procedure for drenching skin — If poisons come in contact with the skin, they must be removed as quickly as possible. Remove contaminated clothing and flood the skin area with water for 10 minutes. Then gently wash the skin area with soap and water and rinse. Later, destroy contaminated clothing. For a chemical skin burn, rinse the area with lots of water, remove the clothes and cover with a soft, clean cloth. Do not apply grease or ointments
- MPC, Corp. ensures that medical personnel will be readily available for advice and consultation in the matters of occupational health
- It is the policy of MPC, Corp. that all of the requirements of OSHA §1926.50 will be met

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY FOR GASEOUS CHLORINE AWARENESS

MPC, Corp. has adopted this policy for the prevention of employee exposure to hazardous levels of gaseous chlorine in accordance with the following OSHA guidelines:

Possible Locations Employees may be exposed to Chlorine

The following operations may involve chlorine and lead to worker exposure to this substance:

- Water treatment facilities
- Chlorine injection facilities
- Water pre-treatment areas
- The manufacture and transportation of chlorine
- Use as a chlorinating and oxidizing agent in organic and inorganic synthesis; in the manufacture of chlorinated solvents, automotive antifreeze and antiknock compounds, polymers (synthetic rubber and plastics), resins, elastomers, pesticides, refrigerants, and in the manufacture of rocket fuel
- Use as a fluxing, purification, and extraction agent in metallurgy
- Use as a bacteriostat, disinfectant, odor control, and demulsifier in treatment of drinking water, swimming pools, and in sewage
- Use in the paper and pulp, and textile industries for bleaching cellulose for artificial fibers; use in the manufacture of chlorinated lime; use in detinning and dezincing iron; use to shrink-proof wool
- Use in the manufacture of pharmaceuticals, cosmetics, lubricants, flameproofing, adhesives, in special batteries containing lithium or zinc, and in hydraulic fluids; use in processing of meat, fish, vegetables, and fruit
- Use as bleaching and cleaning agents, and as a disinfectant in laundries, dishwashers, cleaning powders, cleaning dairy equipment and bleaching cellulose

Chemical and Physical Properties

Chlorine is a greenish-yellow gas with a characteristic pungent odor. It condenses to an amber liquid at approximately -34 degrees C (-29.2 degrees F) or at high pressures. It has a distinct pungent odor. Odor thresholds ranging from 0.08 to 1 part per million (ppm) parts of air have been reported. Chlorine is more dense than water therefore will be found low to the ground. Prolonged exposure may result in olfactory fatigue.

Physical Data

Melting point: -101 degrees C (-149.8 degrees F)

Vapor pressure at 20 degrees C (68 degrees F): 4,800 mm Hg

Solubility: Slightly soluble in water; soluble in alkalies, alcohols, and chlorides.

Reactivity

Cylinders of chlorine may burst when exposed to elevated temperatures. Chlorine in solution forms a corrosive material.

Incompatibilities: Flammable gases and vapors form explosive mixtures with chlorine. Contact between chlorine and many combustible substances (such as gasoline and petroleum products, hydrocarbons, turpentine, alcohols, acetylene, hydrogen, ammonia, and sulfur), reducing agents, and finely divided metals may cause fires and explosions.

Contact between chlorine and arsenic, bismuth, boron, calcium, activated carbon, carbon disulfide, glycerol, hydrazine, iodine, methane, oxomonosilane, potassium, propylene, and silicon should be avoided.

Chlorine reacts with hydrogen sulfide and water to form hydrochloric acid, and it reacts with carbon monoxide and sulfur dioxide to form phosgene and sulfuryl chloride. Chlorine is also incompatible with moisture, steam, and water.

For small fires use water only; do not use dry chemical or carbon dioxide. Contain and let large fires involving chlorine burn. If fire must be fought, use water spray or fog.

Potential Health Effects

Exposure to chlorine can occur through inhalation, ingestion, and eye or skin contact.

Exposure to chlorine can cause throat irritation, vomiting, frostbite burns, tooth enamel corrosion, nausea, and possible death at high concentration levels.

Severe acute effects of chlorine exposure in humans have been well documented since World War I when chlorine gas was used as a chemical warfare agent. Other severe exposures have resulted from the accidental rupture of chlorine tanks. These exposures have caused death, lung congestion, and pulmonary edema, pneumonia, pleurisy, and bronchitis.

Signs and Symptoms of Exposure

- Acute exposure: Acute exposure to low levels of chlorine results in eye, nose, and throat irritation, sneezing, excessive salivation, general excitement, and restlessness. Higher concentrations causes difficulty in breathing, violent coughing, nausea, vomiting, cyanosis, dizziness, headache, choking. Contact with the liquid can result in frostbite burns of the skin and eyes.
- Chronic exposure: Chronic exposure to low levels of chlorine gas can result in dermatitis, tooth enamel corrosion, coughing, severe chest pain, sore throat, hemoptysis and increased susceptibility to tuberculosis.

Site Specific Contingency/Emergency Plans

MPC, Corp. will ensure employees are instructed in the facility's site specific contingency plans and provisions, where the chlorine is used in the facility, and additional plant safety rules.

Emergency Medical Procedures

Rescue: Remove an incapacitated worker from further exposure and implement appropriate emergency procedures (e.g., those listed on the Safety Data Sheet required by OSHA's Hazard Communication Standard [29 CFR 1910.1200]). All workers should be familiar with emergency procedures, the location and proper use of emergency equipment, and methods of protecting themselves during rescue operations.

Spills and Leaks

In the event of a spill or leak involving chlorine, persons not wearing protective equipment and fully-encapsulating, vapor-protective clothing should be restricted from contaminated areas until cleanup has been completed. The following steps should be undertaken following a spill or leak:

- Notify safety personnel.
- Remove all sources of heat and ignition.
- Keep all combustibles (wood, paper, oil, etc.) away from the leak.
- Ventilate potentially explosive atmospheres.
- Evacuate the spill area for at least 50 feet in all directions.
- Find and stop the leak if this can be done without risk; if not, move the leaking container to an isolated area until gas has dispersed. The cylinder may be allowed to empty through a reducing agent such as sodium bisulfide and sodium bicarbonate.
- Use water spray to reduce vapors; do not put water directly on the leak or spill area.

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. has implemented this program to ensure employees are informed of any chemical hazards and hazardous or toxic substances in their workplace:

MPC, Corp. will develop, implement, and maintain at each workplace a written hazard communication program that describes how labels and other forms of warning, safety data sheets, and employee information will be accomplished.

A copy of the Company's Hazard Communication Program is available to all employees and will be kept at each jobsite by the foreman in charge, or in the office. Translations of the hazard communication program are available to non-English speaking employees upon request from Tim Foster.

Employees will be notified of any hazardous substances used by any company other than MPC, Corp. in the workplace and make safety data sheets available to employees.

A list of all chemicals known to be used at the workplace by company employees will be available for review at the jobsite and in the office. Safety Data Sheets (SDS) for all chemicals used in the workplace by MPC, Corp. are available to employees at the worksite from the job foreman or in the office.

Changes of job assignments, changes in materials used, or any non-routine tasks involving hazardous substances or conditions will require notification and/or retraining of effected employees. Tim Foster will inform or retrain employees of any new or additional hazards, detail methods of hazard abatement or elimination, and provide proper personal protective equipment or engineering controls necessary for the job. Notifications and retraining will be documented as to name of employee, date, description of action taken, and verification by Tim Foster.

CONTAINER LABELING

Tim Foster will ensure that each container of hazardous chemicals in the workplace is labeled, tagged, or marked with the following information:

- Identity of the hazardous chemical(s)
- Pictograms
- A signal words
- Hazard and precautionary statements
- The product identifier
- Supplier identification

Tim Foster will ensure labels or other, written warning forms, are legible and prominently displayed on the container, or readily available in the work area throughout each work shift. When MPC, Corp. has employees, whose primary language is not English, information will be presented in their language as well.

No container will be released for use until this information is verified. Tim Foster will ensure that all containers are labeled with a copy of the original manufacturer's label or a label that has the appropriate identification and hazard warning.

SAFETY DATA SHEETS

An SDS will be gathered and made available for every hazardous material at the worksite.

SDS are readily available for review to all MPC, Corp. employees, and cover all hazardous chemicals used in the workplace. SDS are kept with the hazard communication plan at the office location listed above. The safety data sheets are updated and managed by Tim Foster. If a safety data sheet is not available for a hazardous chemical, before use, notify Tim Foster, and a SDS will be obtained for the chemical to be used.

MPC, Corp. will maintain in the workplace copies of the required safety data sheets for each hazardous chemical and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s). -Where employees must travel between workplaces during a work shift, i.e., their work is carried out at more than one geographical location, the safety data sheets may be kept at the primary workplace facility.

MULTI-EMPLOYER WORKPLACES

MPC, Corp. will use the following methods when working multiemployer worksites or employees are on multiple worksites where hazardous chemicals are produced, used, or stored:

- On-site access to SDSs for each hazardous chemical that other employer(s)' employees may be exposed to
- Inform other employer(s) of any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions, and in foreseeable emergencies
- Inform other employer(s) of the labeling systems used in the workplace

A copy of the written hazard communication program is available to employees, their designated representatives, the Assistant Secretary, or the Director upon request, in accordance with the requirements of 29 CFR 1910.1020 (e).

Where employees must travel between workplaces during a work shift (i.e., their work is carried out at more than one geographical location), the written hazard communication program may be kept at the primary workplace facility. If there is no primary site, the program must be sent with employees.

TRAINING

Required Hazard Communication Training

If you have employees who may be exposed to hazardous chemicals, you must inform them about the chemicals and train them when they are hired and whenever they are exposed to a new chemical hazard or a process change. Required employee training includes:

- An overview of the requirements in OSHA's CFR 29 1910.1200 hazard communication
- The written hazard-communication plan, and where it may be reviewed
- Hazardous chemicals present in their workplace
- The operations where hazardous chemicals are used
- Physical and health effects of the hazardous chemicals
- Methods used to determine the presence or release of hazardous chemicals in the work area
- How to reduce or prevent exposure to these hazardous chemicals through use of control/work practices and personal protective equipment
- Where to find and how to read the hazard-communication plan, the list of hazardous chemicals, and SDS
- The physical and health hazards of hazardous chemicals used by employees
- The meaning of warning labels on hazardous-chemical containers and on pipes that contain hazardous substances
- Emergency procedures to follow if an employee is exposed to these chemicals
- How to use personal protective equipment

Label Elements Training

MPC, Corp. will ensure all employees know the following elements of the labels: product identifier, signal word, pictogram, hazard statement, precautionary statement, and name address and phone number of chemical manufacturers, distributor, or importer.

Employees will also be trained on how to use the labels, to ensure proper storage and quickly locate first aid information.

They also need to know how the elements work together on a label.

- The different pictograms to indicate multiple hazards
- Where there are similar precautions, the one with most protective information will be on the label

SDS Training

Employees will be trained on the standardized 16-section format and the type of information found in each one.

Training will also explain how the SDS information is related to the label information.

After attending the training, each employee will sign a company training form verifying they understand the above topics and how the topics are related to our hazard communication plan.

General Safety Considerations

Employers who produce, use, or store hazardous chemicals at a workplace in such a way that the employees of other employer(s) may be exposed will additionally ensure that the hazard communication programs developed and implemented include the following: methods the employer will use to provide the other employer(s) on-site access to safety data sheets, precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies, the labeling system used in the workplace.

The company may not remove or deface existing labels on incoming containers of hazardous chemicals unless the container is immediately marked with the required information.

Hazardous Chemicals List

The following list identifies all hazardous chemicals used at this workplace. Detailed information about the physical and health effects of each chemical is included in a safety data sheet; the identity of each chemical on the list matches the identity of the chemical on its safety data sheet. Safety data sheets are readily available to employees in their work areas.

Product or Brand Name	Manufacturer	Hazardous Ingredient

Hazardous Non-Routine Tasks

Before employees perform non-routine tasks that may expose them to hazardous chemicals, they will be informed by their supervisors about the chemicals' hazards. Their supervisors also will inform them about the safe work practices necessary to control exposure and what to do in an emergency. Examples of non-routine tasks that may expose employees to hazardous chemicals include the following:

Task:	Hazard:

Hazardous Chemicals in Labeled or Unlabeled Pipes, Closed, or Hidden Systems

Before working in areas where hazardous chemicals are transferred through labeled or unlabeled pipes or where pipes are insulated with asbestos-containing material, employees will contact Tim Foster for the following information: the chemicals in the pipes; the physical or health effects of the chemicals or the asbestos insulation; the safe work practices to prevent exposure.

Notification of Contractors

It is the responsibility of the assigned job foreman to provide any workplace-associated contractors and their employees with the following information, if they may be exposed to hazardous chemicals in our workplace:

- The identity of the chemicals, how to review safety data sheets, and an explanation of the container and pipe labeling system
- Safe work practices to prevent exposure

This person will also obtain a safety data sheet for any hazardous chemical a contractor brings into the workplace to which an employee of MPC, Corp. may be exposed.

The Hazard Communication program will be made available, upon request, to employees, their designated representatives, the Assistant Secretary & the Director.

Hazard Communication in the Workplace

The essence of hazard communication is a warning. We use thousands of chemical products throughout our lives, at home and at work. However, most of us would be hard-pressed to distinguish safe products from hazardous ones without a warning (the familiar skull-and-crossbones, for example). The warning tells us the product is hazardous, that it can harm us if we use it improperly.

In the workplace, hazard communication ensures workers who may be exposed to hazardous chemicals know about the chemicals' hazards and understand how to protect themselves from exposure.

The Hazard Communication Process

Hazard communication begins when chemical manufacturers and importers evaluate their products to determine each product's chemical hazards. Next, they prepare a Safety Data Sheet (SDS) for each product. An SDS includes detailed information about the product's hazards. Manufacturers and importers must include an SDS and a warning label with each container of product they ship to a customer.

The part of the process that affects your workplace is the "Written Hazard Communication Plan." The plan identifies hazardous chemicals at your workplace and describes how you will use safety data sheets, warning labels, and training to protect employees and keep informed about the product's chemical hazards.

The labeling system, location of SDS, routine precautions and emergency procedures will be provided to other employers and employees who may be affected by hazardous chemicals produced, used, or stored at the worksite.

Definition of a Hazardous Chemical

OSHA's hazard-communication rule, 1910.1200, defines a hazardous chemical as "any element, chemical compound, or mixture that is a physical hazard or a health hazard".

Chemicals that are Physical Hazards

Chemicals that are physical hazards are unstable and, when handled improperly, can cause fires or explosions. A chemical that is a physical hazard has one of the following characteristics:

- Is a combustible liquid
- Is a compressed gas
- Is explosive
- Is flammable
- Is water-reactive
- Starts or promotes combustion in other materials
- Can ignite spontaneously in air

Chemicals that are Health Hazards

Chemicals that are health hazards can damage an exposed person's tissue, vital organs, or internal systems. Generally, the higher the chemical's toxicity, the lower the amount or dose necessary for it to have harmful effects. The effects vary from person to person, ranging from temporary discomfort to permanent damage, depending on the dose, the toxicity, and the duration of exposure to the chemical.

Health effects range from short-duration symptoms that often appear immediately (acute effects) to persistent symptoms that may appear after longer exposures (chronic effects). Health effects can be classified by how they affect tissue, vital organs, or internal systems:

- Agents that damage the lungs, skin, eyes, or mucous membranes
- Carcinogens cause cancer
- Corrosives damage living tissue
- Hematopoietic agents affect the blood system
- Hepatotoxins cause liver damage
- Sensitizers cause allergic reactions & Irritants cause inflammation of living tissue
- Nephrotoxins damage cells or tissues of the kidneys
- Neurotoxins damage tissues of the nervous system
- Reproductive toxins damage reproductive systems, endocrine systems, or a developing fetus

How to Determine Whether a Chemical is Hazardous

A chemical is hazardous if it is listed in any of the following documents:

- OSHA Division 2, Subdivision Z safety and health rules, Toxic and Hazardous Substances; Division 3, Subdivision Z, Toxic and Hazardous Substances (Construction); Division 4, Subdivision Z, Chemical/Toxins (Agriculture)
- Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment (latest edition). Published by the American Conference of Industrial Hygienists (ACGIH)
- The Registry of Toxic Effects of Chemical Substances, published by the National Institute for Occupational Safety and Health (NIOSH)
- The container label of the product will issue a warning of hazardous effects

Commonly Used Hazardous Chemicals

Listed below are chemicals among those most commonly used in U.S. workplaces:

Hazardous Chemical	Harmful Effects
1,1,1-Trichloroethane	May cause mutations in cells; can irritate the skin and eyes and cause unconsciousness and death. High exposures may damage the liver and kidneys.
Acetone	Can irritate the skin, eyes, nose, and throat. High concentrations can cause dizziness and loss of consciousness.
Aluminum oxide	Can irritate the eyes, nose, and throat. Repeated high exposure can cause scarring of the lungs and shortness of breath.
Ammonia	Can irritate the lungs and burn the eyes and skin. Long-term exposure can cause irritation of the eyes, nose, mouth, and throat.
Benzene	A cancer-causing agent that has been shown to cause leukemia. May also cause headaches and irritation of the eyes, nose, and throat. High exposure can cause convulsions and death.
Ethylbenzene	Can irritate the eyes, nose, and throat. Repeated contact can cause drying and scaling of skin and may cause liver damage. High concentrations may cause dizziness and loss of consciousness.
Ethylene glycol	Can irritate the eyes, nose, or throat and cause nausea, vomiting, and headaches. Repeated or high exposure levels can cause kidney damage or stones and brain damage. May cause birth defects.
Freon 113	May cause skin irritation and rashes as well as drowsiness.
Glycol ethers	Can irritate the eyes, nose, and throat and may cause birth defects. Repeated or high exposure can cause kidney damage or stones. Brain damage also may occur.
Hydrochloric acid	Can irritate the lungs. High exposure can cause buildup of fluid in the lungs, which can cause death.
Lead	Can cause weakness and insomnia. Higher exposure can result in damage to the nervous and reproductive systems.
Methanol	Irritates the eyes, nose, mouth, and throat and can cause liver damage.

Hazardous Chemical	Harmful Effects
Methyl ethyl ketone	Can cause dizziness, headaches, blurred vision, and loss of consciousness. May cause birth defects.
Methyl isobutyl ketone	Irritates the skin, eyes, nose, and throat, and may cause dizziness, nausea, diarrhea, and loss of consciousness. Long-term exposure may damage the liver and kidneys.
Phenol	Can irritate the mouth, nose, throat, and eyes. Long-term exposure may damage the liver and kidneys and lead to genetic damage. May be a cancer risk. Major skin contacts or inhaling it can cause death.
Sodium hydroxide	Breathing the dust or droplets can irritate and burn the lungs. Contact can cause severe skin burns.
Sulfuric acid	Can severely burn the skin and eyes. Repeated long-term exposure can cause bronchitis, shortness of breath, and emphysema.
Tetrachloroethylene	A suspected human carcinogen that has caused liver cancer in animals. It may damage the liver and kidneys after low but repeated exposure. It can cause dizziness and loss of consciousness.
Xylene	Can irritate the eyes, nose, and throat; high levels can cause loss of consciousness and death. It may damage fetuses. Repeated exposure may damage bone marrow and eyes and cause stomach problems.

Using Safety Data Sheets

An SDS contains detailed information about a hazardous chemical product's health effects, physical and chemical characteristics, and safe practices for using it.

Responsibilities of Chemical Manufacturers, Importers, and Distributors

Chemical manufacturers and importers must prepare an SDS for each hazardous chemical product they produce. Distributors are responsible for ensuring that you have an SDS for each hazardous chemical product they sell to you.

What to do if You Use Hazardous Chemical Products at Your Workplace

You must have a current SDS for each product. Employees must be able to review the SDS in their work area at any time. You can keep SDS in a notebook or on a computer, though employees must be able to obtain the information immediately in an emergency. One person will be responsible for managing all the SDS at your workplace. The person will ensure the list of hazardous chemicals is current, that the identity of each chemical on the list matches its identity on its SDS, and that incoming hazardous chemical containers have an SDS.

What to do When You No Longer Use a Hazardous Chemical at Your Workplace

When you no longer use a hazardous chemical, you do not need to keep its SDS. However, you do need to keep a record of the chemical's identity, the locations, and the calendar years it was used in your workplace, for at least 30 years. For more information about record-keeping requirements, see the "Access to employee exposure and medical records" section of 1910.1020.

Information required on Safety Data Sheets

Chemical manufacturers and importers must prepare an SDS for each hazardous chemical product they ship to you. The following information must appear on each sheet.

- Section 1, Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use.
- Section 2, Hazard(s) identification includes all hazards regarding the chemical; required label elements.
- Section 3, Composition/information on ingredients includes information on chemical ingredients, trade secret claims.
- Section 4, First-aid measures includes important symptoms/effects, acute, delayed; required treatment
- Section 5, Fire-fighting measures lists suitable extinguishing techniques, equipment, chemical hazards from fire.
- Section 6, Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup.
- Section 7, Handling and storage lists precautions for safe handling and storage, including incompatibilities.
- Section 8, Exposure controls/personal protection lists OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; personal protective equipment (PPE)
- Section 9, Physical and chemical properties lists the chemical's characteristics.
- Section 10, Stability and reactivity lists chemical stability and possibility of hazardous reactions.
- Section 11, Toxicological information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity.
- Section 12, Ecological information*
- Section 13, Disposal considerations*
- Section 14, Transport information*
- Section 15, Regulatory information*
- Section 16, Other information, includes the date of preparation or last revision.

* OSHA does not require these sections.

Using Container Warning Labels

The purpose of a container warning label is to warn employees about the container's contents and to refer employees to an appropriate SDS for more information about the chemical's physical and health hazards. Manufacturers, importers, and distributors must ensure that each hazardous chemical product sold to you has a label that includes the chemical's identity, a hazard warning, and a name and address for additional information about the product. If you use hazardous chemicals at your workplace, you must ensure that each hazardous chemical container has a legible label, in English, that identifies the chemical and warns of its hazards.

Containers that Must be Labeled

Original containers of hazardous chemicals from a manufacturer, importer, or distributor must have warning labels. Do not remove or deface them. If you transfer a hazardous chemical from a labeled container to an unlabeled container, label the container.

Contents of a Warning Label

A warning label must identify the chemical – a common chemical name or a code name is acceptable – and display a hazard warning such as DANGER or the familiar skull and crossbones.

- The identity of the chemical on the label, on its SDS, and on your hazardous chemical sheet must match
- If you are not sure a hazardous chemical container is properly labeled, contact the manufacturer or supplier
- Make someone at your workplace responsible for ensuring all hazardous-chemical containers are properly labeled

MPC, Corp. will ensure that workplace labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. If MPC, Corp. has employees who speak other languages, the company may add the information in their language to the material presented, as long as the information is presented in English as well.

EXAMPLE OF ORIGINAL CONTAINER GHS LABEL

SAMPLE LABEL	
CODE _____ Product Name _____	Product Identifier
Company Name _____ Street Address _____ City _____ State _____ Postal Code _____ Country _____ Emergency Phone Number _____	Supplier Identification
Keep container tightly closed. Store in a cool, well-ventilated place that is locked. Keep away from heat/sparks/open flame. No smoking. Only use non-sparking tools. Use explosion-proof electrical equipment. Take precautionary measures against static discharge. Ground and bond container and receiving equipment. Do not breathe vapors. Wear protective gloves. Do not eat, drink or smoke when using this product. Wash hands thoroughly after handling. Dispose of in accordance with local, regional, national, international regulations as specified. In Case of Fire: use dry chemical (BC) or Carbon Dioxide (CO ₂) fire extinguisher to extinguish. First Aid If exposed call Poison Center. If on skin (or hair): Take off immediately any contaminated clothing. Rinse skin with water.	Precautionary Statements
Highly flammable liquid and vapor. May cause liver and kidney damage.	Hazard Statements
 	Hazard Pictograms
Danger	Signal Word
Directions for Use _____ _____ _____	Supplemental Information
Fill weight: _____ Lot Number: _____ Gross weight: _____ Fill Date: _____ Expiration Date: _____	

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Secondary/Portable Containers

Secondary containers are used to hold material transferred from the manufacturers' original container. These are required to be labelled if:

- Is not used within the work shift by the individual who makes the transfer
- The worker who made the transfer leaves the work area
- The container is moved to another work area and is no longer in the possession of the person who filled the container

Labels for secondary containers must include:

- The identity of the chemical and appropriate hazard warnings must be shown on the label.
- The hazard warning that provides users with an immediate understanding of the primary health and/or physical hazard(s) of the chemical through the use of words, pictures, symbols, or any combination of these elements
- The name and address of the manufacturer, importer or other responsible party

The hazard label message must be legible, permanently displayed and written in English

Portable containers are intended for immediate use of a chemical by the person who makes the transfer. Labels on portable containers are not required if the worker who made the transfer uses all of the contents during the work shift, or the chemical is return to a labelled primary or secondary container at the end of the shift, or when work is completed.

CONFIRMATION OF EMPLOYEE'S HAZARD COMMUNICATION TRAINING

I, _____, have been informed about the hazardous chemicals that I may be exposed to during my work and I have received training on the following topics:

- An overview of the requirements in OSHA's hazard communication rules.
- Hazardous chemicals present in the workplace.
- The written hazard-communication plan.
- Physical and health effects of the hazardous chemicals.
- Methods to determine the presence or release of hazardous chemicals in the work area.
- How to reduce or prevent exposure to these hazardous chemicals through use of exposure controls/work practices and personal protective equipment.
- Steps we have taken to reduce or prevent exposure to these chemicals.
- Emergency procedures to follow if exposed to these chemicals.
- How to read labels and review Safety Data Sheets.

Note to Employee: This form becomes part of your personnel file; read and understand it before signing.

By signing below, I attest and verify that I have received training in the above areas of hazard communication, and that I understand the content of that training.

Employee

Date

Trainer

Date

POLICY

MPC, Corp. has implemented this policy to ensure no employee is exposed to hazards caused by improper or unsafe use of ladders and/or stairways. MPC, Corp. will provide a training program for each employee using ladders and stairways. The program will enable each employee to recognize hazards related to ladders and stairways and will train each employee in the procedures to be followed to minimize these hazards.

REFERENCES

- §1926.1050 – Ladders and Stairways

RESPONSIBILITIES

Ladder and stairway safety is a responsibility shared between the Company and its employees.

Employer Responsibilities

- Providing and installing all stairway and ladder fall protection systems required by this subpart and will comply with all other pertinent requirements of this subpart before employees begin the work that necessitates the installation and use of stairways, ladders, and their respective fall protection systems
- Ensuring that visual safety inspections of ladders and stairways occur on regular basis
- Training personnel
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing job hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness

Safety Committee Responsibilities

- Assist in jobsite ladders and stairways as necessary
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

- Assist in jobsite ladder and stairway inspections
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

Tim Foster will ensure each employee has been trained by a competent person in the following areas, as applicable: The nature of fall hazards in the work area; The correct procedures for erecting, maintaining, and disassembling the fall protection systems to be used; the proper construction, use, placement, and care in handling of all stairways and ladders; the maximum intended load-carrying capacities of ladder; the standards contained in §1926.1050 – Ladders and Stairways.

Retraining will be provided for each employee as necessary so that the employee maintains the understanding and knowledge acquired through previous training required for OSHA compliance.

SAFE PRACTICES

A stairway or ladder will be at all access points with a break in elevation of 19 inches or more without a ramp, runway, sloped embankment, or personnel hoist.

- Employees will not use any spiral stairways that will not be a permanent part of the structure on which construction work is being performed
- A double-cleated ladder or two or more separate ladders will be provided when ladders are the only mean of access or exit from a working area for 25 or more employees, or when a ladder is to serve simultaneous two-way traffic
- When a building or structure has only one point of access between levels, that point of access will be kept clear to permit free passage of employees. When work must be performed or equipment must be used such that free passage at that point of access is restricted, a second point of access will be provided and used
- When a building or structure has two or more points of access between levels, at least one point of access will be kept clear to permit free passage of employees

Ladders

Tim Foster will ensure the following requirements are adhered to concerning the use of all ladders:

- When portable ladders are used for access to an upper landing surface, the ladder side will extend at least 3 feet above the upper landing surface to which the ladder is used to gain access; or, when such an extension is not possible because of the ladder's length, then the ladder will be secured at its top to a rigid support that will not deflect, and a grasping device, such as a grabrail, will be provided to assist employees in mounting and dismounting the ladder. In no case will the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support
- Ladders will be maintained free of oil, grease, and other slipping hazards
- Ladders used by employees must meet OSHA/ANSI specifications
- Ladder rungs, cleats, and steps will be parallel, level, and uniformly spaced when the ladder is in position for use
- Ladders will not be loaded beyond the maximum intended load for which they were built or beyond their manufacturer's rated capacity. Ladders need to have the load capacity needed for the task

- Rungs, cleats, and steps of portable ladders (except as provided below) and fixed ladders (including individual-rung/step ladders) shall be spaced not less than 10 inches (25 cm) apart, nor more than 14 inches (36 cm) apart, as measured between center lines of the rungs, cleats, and steps
- Rungs, cleats, and steps of step stools shall be not less than 8 inches (20 cm) apart, nor more than 12 inches (31 cm) apart, as measured between center lines of the rungs, cleats, and steps
- Rungs, cleats, and steps of the base section of extension trestle ladders shall not be less than 8 inches (20 cm) nor more than 18 inches (46 cm) apart, as measured between center lines of the rungs, cleats, and steps
- The rung spacing on the extension section of the extension trestle ladder shall be not less than 6 inches (15 cm) nor more than 12 inches (31 cm), as measured between center lines of the rungs, cleats, and steps
- The minimum clear distance between the sides of individual-rung/step ladders and the minimum clear distance between the side rails of other fixed ladders shall be 16 inches (41 cm)
- The minimum clear distance between side rails for all portable ladders shall be 11 1/2 inches (29 cm)
- The rungs of individual-rung/step ladders shall be shaped such that employees' feet cannot slide off the end of the rungs
- The rungs and steps of portable metal ladders shall be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping
- Ladders will be used only for the purpose for which they were designed
- Non-self-supporting ladders will be used at a 75 degree angle
- Wood job-made ladders with spliced side rails will be used at an angle such that the horizontal distance is one-eighth the working length of the ladder
- Fixed ladders will be used at a pitch no greater than 90 degrees from the horizontal
- Ladders will be used only on stable and level surfaces unless secured
- Ladders will not be used on slippery surfaces without slip-resistant feet unless secured. Slip-resistant feet will not be used as a substitute for care in placing, lashing, or holding a ladder that is used upon slippery surfaces, including flat metal or concrete surfaces that are constructed so they cannot be prevented from becoming slippery
- Ladders placed where they can be displaced by workplace activities or traffic, such as in passageways, doorways, or driveways, will be secured to prevent accidental displacement, or a barricade will be used to keep the activities or traffic away from the ladder
- The area around the top and bottom of ladders will be kept clear
- The top of a non-self-supporting ladder will be placed with the two rails supported equally unless it is equipped with a single support attachment
- Ladders will not be moved, shifted, or extended while occupied
- Ladders will have nonconductive side-rails if they are used where the employee or the ladder could contact exposed energized electrical equipment
- The top or top step of a stepladder will not be used as a step
- Cross-bracing on the rear section of stepladders will not be used for climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections
- Ladders will be inspected by a competent person before initial use in each work shift, and more frequently as necessary, and after any occurrence that could affect their safe use to identify any visible defects that could cause employee injury.

- Portable ladders with structural defects will either be immediately marked in a manner that readily identifies them as defective, or be tagged with "DO NOT USE" or similar language, and will be withdrawn from service until repaired
- Fixed ladders with structural defects, such as broken or missing rungs, cleats, or steps, broken or split rails, or corroded components, will be withdrawn from service until repaired. The defective ladder will be withdrawn from service in the following manner: immediately tagged with "Do Not Use" or similar language; marked in a method that readily identifies it as defective; blocked from further use, such as with a plywood attachment that spans several rungs
- Before damaged or defective ladder may be returned to service, repairs will be made that restore the ladder to its original design specifications
- Single-rail ladders will not be used
- When ascending or descending a ladder, the user will face the ladder
- Each employee will use at least one hand to grasp the ladder when progressing up and/or down the ladder
- An employee will not carry any object or load that could cause the employee to lose balance and fall
- Extension ladders will be placed one unit away from the vertical surface for every four units high

Stairways

Tim Foster will ensure the following requirements are applied to all stairways:

- Stairways that will not be a permanent part of the structure on which construction work is being performed will have landings of not less than 30 inches in the direction of travel and extend at least 22 inches in width at every 12 feet or less of vertical rise
- Stairs will be installed between 30 deg. and 50 deg. from horizontal
- Riser height and tread depth will be uniform within each flight of stairs, including any foundation structure used as one or more treads of the stairs. Variations in riser height or tread depth will not be over ¼-inch in any stairway system
- Where doors or gates open directly on a stairway, a platform will be provided, and the swing of the door will not reduce the effective width of the platform to less than 20 inches
- Metal pan landings and metal pan treads, when used, will be secured in place before filling with concrete or other material
- All parts of stairways will be free of hazardous projections, such as protruding nails
- Slippery conditions on stairways will be eliminated before the stairways are used to reach other levels
- Except during stairway construction, foot traffic is prohibited on stairways with pan stairs where the treads and/or landings are to be filled in with concrete or other material at a later date, unless the stairs are temporarily fitted with wood or other solid material at least to the top edge of each pan. Such temporary treads and landings will be replaced when worn below the level of the top edge of the pan
- Except during stairway construction, foot traffic is prohibited on skeleton metal stairs where permanent treads and/or landings are to be installed at a later date, unless the stairs are fitted with secured temporary treads and landings long enough to cover the entire tread and/or landing area

- Treads for temporary service will be made of wood or other solid material, and will be installed the full width and depth of the stair
- Stairways having four or more risers or rising more than 30 inches, will be equipped with: at least one handrail; one stair rail system along each unprotected side or edge
- Winding and spiral stairways will be equipped with a handrail offset sufficiently to prevent walking on those portions of the stairways where the tread width is less than 6 inches
- The height of stair rails will be as follows will be not less than 36 inches from the upper surface of the stair rail system to the surface of the tread, in line with the face of the riser at the forward edge of the tread
- Midrails, screens, mesh, intermediate vertical members, or equivalent intermediate structural members, will be provided between the top rail of the stair rail system and the stairway steps
 - Midrails will be located at a height midway between the top edge of the stair rail system and the stairway steps
 - Screens or mesh will extend from the top rail to the stairway step, and along the entire opening between top rail supports
 - When intermediate vertical members, such as balusters, are used between posts, they will be not more than 19 inches apart
 - Other structural members will be installed such that there are no openings in the stair rail system that are more than 19 inches wide
- Handrails and the top rails of stair rail systems will be capable of withstanding, without failure, a force of at least 200 pounds applied within 2 inches of the top edge, in any downward or outward direction, at any point along the top edge
- The height of handrails will be not more than 37 inches or less than 30 inches from the upper surface of the handrail to the surface of the tread
- When the top edge of a stair rail system also serves as a handrail, the height of the top edge will be not more than 37 inches or less than 36 inches
- Stair rail systems and handrails will be so surfaced as to prevent injury to employees from punctures or lacerations, and to prevent snagging of clothing
- Handrails will provide an adequate handhold for employees grasping them to avoid falling
- The ends of stair rail systems and handrails will be constructed so as not to constitute a projection hazard
- Handrails that will not be a permanent part of the structure being built will have a minimum clearance of 3 inches between the handrail and walls, stair rail systems, and other objects
- Unprotected sides and edges of stairway landings will be provided with guardrail systems

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. has implemented this policy to ensure no employee is exposed to noise that exceeds the action levels. Tim Foster is the designated supervisor for ensuring the following engineering controls and work practices will be enforced:

Hearing protectors are available upon request from Tim Foster at no cost to all employees exposed to an 8-hr. time-weighted average of 85 decibels. Hearing protection will be replaced as necessary. Each employee will be properly trained in the use, care, and fitting of hearing protectors. Tim Foster will ensure that hearing protectors are worn. Employees will be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors.

MPC, Corp. will provide a continuing effective hearing conservation program when employees are exposed to sound levels greater than 85 dBs on an 8 hour time-weighted average basis.

When information indicates that employee exposure may equal/exceed the 8 hr time-weighted avg. of 85 decibels, Tim Foster will implement a monitoring program to identify employees to be tested.

TRAINING

Upon initial hiring, all employees will be trained about being exposed to noise at or above an 8 hour time weighted average of 85 decibels. The hazards presented by excessive noise levels in the workplace, and the use and care of hearing protection devices. Training will be repeated annually for each employee and updated to reflect changes in personal protective equipment (PPE) and work processes or requirements. Tim Foster will ensure the participation of all employees and make copies of the noise exposure procedures available to affected employees and will also post a copy in the workplace and allow OSHA access to records.

HEARING PROTECTION

Hearing protectors are available upon request from Tim Foster at no cost to all employees exposed to an 8-hr. time-weighted average of 85 decibels. Hearing protection will be replaced as necessary. Each employee will be properly trained in the use, care, and fitting of hearing protectors. Tim Foster will ensure that hearing protectors are worn. Employees will be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors.

Tim Foster will ensure that hearing protectors are worn:

- By an employee who is required by paragraph (b)(1) of this section to wear personal protective equipment; and
- By any employee who is exposed to an 8-hour time-weighted average of 85 decibels or greater, and who:
 - Has not yet had a baseline audiogram established pursuant to paragraph (g)(5)(ii); or
 - Has experienced a standard threshold shift

AUDIO MONITORING

Audio monitoring will be implemented if it is believed noise levels in work areas are approaching or exceed action level limits. If monitoring results indicate exposures equaling or exceeding safe limits, an employee will be included in a hearing conservation program.

All continuous, intermittent, and impulsive sound levels from 80 decibels to 130 decibels shall be integrated into the noise measurements. Instruments used to measure employee noise exposure shall be calibrated to ensure measurement accuracy.

Monitoring shall be repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that:

- Additional employees may be exposed at or above the action level; or
- The attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements

Employee notification. The employer shall notify each employee exposed at or above an 8-hour time-weighted average of 85 decibels of the results of the monitoring.

Observation of monitoring. The employer shall provide affected employees or their representatives with an opportunity to observe any noise measurements conducted pursuant to this section.

When employees are subjected to sound exceeding those listed in the below table, feasible administrative or engineering controls shall be utilized. If such controls fail to reduce sound levels within the levels of table, personal protective equipment shall be provided and used to reduce sound levels within the levels of the table overleaf.

DURATION OF EXPOSURE	SOUND LEVEL
8 hours	90 decibels
6 hours	92 decibels
4 hours	95 decibels
3 hours	97 decibels
2 hours	100 decibels
1.5 hours	102 decibels
1 hour	105 decibels
30 minutes	110 decibels
15 minutes	115 decibels

Methods of Control

All monitoring results shall be reviewed by the site safety representative. Upon receiving results that indicate noise levels to be above the action level, the site safety representative shall determine which of the following control methods shall be utilized to reduce or eliminate the hazard:

- Tim Foster shall first determine if any means of engineering the problem out are possible. Some of these means may include such things as eliminating the job all together, shortening the length of the job, or installing barriers to reduce noise levels
- If engineering controls are not feasible, then administrative controls shall be taken into consideration. This type of control would include such activity as using job rotation
- Only when it is not feasible for management to implement a type of engineering or administrative control will PPE be used as the primary control method

AUDIOMETRIC TESTING

Tim Foster will maintain an audiometric testing program by making audiometric testing available to all employees whose exposures equal or exceed an 8-hr. time-weighted avg. 85 decibels. The program is provided at no cost to employees.

Within 6 months of an employee's first exposure at or above the action level, MPC, Corp. shall establish a valid baseline audiogram against which future audiograms can be compared. When a mobile van is used, the baseline shall be established within 1 year.

Testing to establish a baseline audiogram will be preceded by at least 14 hours without exposure to workplace noise. Hearing protection may be used to meet the requirement. Employees will also be notified to avoid high levels of noise.

At least annually after obtaining the baseline audiogram, Tim Foster will obtain a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels. Each employee's annual audiogram shall be compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred. If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift, the employee shall be informed of this fact in writing, within 21 days of the determination.

If a standard threshold shift occurs, use of hearing protection shall be re-evaluated and/or refitted and if necessary a medical evaluation may be required. The following procedures will be implemented:

- Employees not using hearing protectors will be fitted with hearing protectors, trained in their use and care, and required to use them
- Employees already using hearing protectors will be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary
- Employees will be referred for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if it is suspected that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors
- Employees will be informed of the need for an otological examination if a medical pathology of the ear that is unrelated to the use of hearing protectors is suspected

- Audiometric evaluation and testing conducted by a licensed physician using the guidelines contained in §1910.95 (g), and is available to all employees whose work requirements equals or exceeds an 8 hr. time-weighted average 85 decibels on a regular basis at no cost to the employee.
- Proctored hearing protector attenuation will be evaluated for the specific noise environments in which the protector will be used. The methods used for measuring attenuation will be one of the four methods described in CCR Title 8, Section 5098, Appendix E
- Hearing protectors must attenuate the noise level to an 8-hour TWA of 90 dBA or less
- For employees who have experienced a standard threshold shift, the attenuation must reduce the sound level to an 8-hour TWA of 85 dBA or less
- Re-evaluation of hearing protectors will be done whenever a workplace noise level increase renders the hearing protector's attenuation inadequate
- Workplaces in which the noise level exceeds 85 dBA will have signs posted. Signs will read "Hearing Protectors Required"

Hearing protection is available at no cost to all employees upon request from the jobsite foreman or company office.

RECORDKEEPING

MPC, Corp. will keep all records collected by this policy, and specifically maintain noise exposure measurement records for at least two years and audiometric test records for the entire length of each employee's employment.

These records will also be transferred to any successor employer if MPC, Corp. ceases to do business

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. has implemented this safety program to ensure the protection of personnel from hazards on the job which may be safeguarded against by the proper use of Personal Protective Equipment (PPE).

Tim Foster is the supervisor responsible for ensuring the following work practices are enforced.

PPE will be provided at no cost for all work required by MPC, Corp. and employees are required by company policy to use only proper company PPE at all times when required on the job or on company property. Failure to use PPE will result in disciplinary action against the violating employee.

- Tim Foster will ensure that if employee-owned PPE is used, MPC, Corp. is responsible that it will be adequate for the application, properly maintained, and kept in sanitary condition
- PPE will be issued and fitted to each affected employee individually. Employees must demonstrate proficiency in donning and doffing equipment, and proper techniques of cleaning and maintaining their respective equipment
- Defective or damaged PPE will NOT be used. Defective or damaged PPE will be immediately tagged "OUT OF SERVICE", removed from service, and replaced with serviceable equipment. PPE will be inspected by the individual employee at the beginning of each work shift
- PPE must be used, stored, and maintained in a sanitary condition. All PPE must be cleaned and/or disinfected and stored according to manufacturer's recommendations

TRAINING

Tim Foster will ensure all employees are properly trained in the recognition and assessment of hazards, the proper selection and use of PPE required for the hazard and how to control the hazards.

PPE training will include when it is necessary; what is necessary; how to don, doff, adjust, and wear PPE; the limitations, proper care, maintenance, useful life and disposal of PPE.

Retraining of employees is required when the workplace changes, making the earlier training obsolete; the type PPE changes; or when the employee demonstrates lack of use, improper use, or insufficient skill or understanding.

Employees will be trained on initial hiring to use, maintain, clean and disinfect, store, and service PPE properly. Employees will receive refresher training on PPE at least annually, or as work requirements, changing job assignments, changing equipment, or environment warrants it. Any employee who demonstrates a lack of knowledge or understanding of any aspect of PPE use or maintenance will be re-trained. An employee must verify his/her understanding of training content as a condition of employment.

All training will be documented and will include the employee name, the dates of training, and the certification subject.

HAZARD ASSESSMENT

Tim Foster will perform a hazard assessment of each jobsite prior to commencement of work to ascertain if hazards are present or likely to be encountered, what engineering controls may be implemented to minimize hazards, and what PPE is necessary for the performance of the job. The hazard assessment will include the certifier's name, signature, date(s), and identification of assessment documents. Affected employees will be notified of hazards, engineering controls needed, and PPE required.

GENERAL REQUIREMENTS

PPE devices should be relied on as the final protection against hazards, used in conjunction with guards, engineering controls, and sound manufacturing practices. It is necessary to consider certain general guidelines for assessing the foot, head, eye and face, and hand hazard situations that exist in an occupational operation or process, and to match the protective devices to the particular hazard. It is the responsibility of Tim Foster to exercise common sense and appropriate expertise to accomplish these tasks.

After completion of a Hazard Identification and Risk Assessment, the general procedure for selection of protective equipment is to:

- Become familiar with the potential hazards and the type of protective equipment that is available, and what it can do; i.e., splash protection, impact protection, etc
- Compare the hazards associated with the environment; i.e., impact velocities, masses, projectile shape, radiation intensities, with the capabilities of the available protective equipment
- Select the protective equipment which ensures a level of protection greater than the minimum required to protect employees from the hazards
- Fit the user with the protective device and give instructions on care and use of the PPE. It is very important that end users be made aware of all warning labels for and limitations of their PPE

PERSONAL WORK CLOTHING

The minimum work clothing acceptable is long pants, good work shoes or boots, and a shirt that completely covers the worker's shoulders (minimum 4-inch sleeves) and provides adequate protection against such hazards as concrete splash, abrasions to the skin, oil or grease spills, and slag from welding or cutting.

Welders should be cautioned against wearing any type of highly flammable clothing, such as polyesters, double-knits, etc. Wool and specially treated cotton are two natural fibers that are fire-resistant and comfortable. Heat-resistant material, such as leather, is used to protect against dry heat, flames, and molten material. Fire-resistant clothing also protects from high workplace temperature and electrical operations.

For the most part, construction workers should wear clothing that is reasonably snug, particularly about the neck, wrists, and ankles. Employees shall not wear loose clothing, rings, watches, necklaces or long hair, all of which may catch in power driven equipment.

Rubber and rubberized fabrics, neoprene, and plastics protect against some acids and chemicals. Disposable chemical suits are used to protect against dusty materials and materials that splash. For materials that have are extremely toxic, a fully encapsulated suit may be necessary.

Arc rated clothing shall be worn during work activities that have been identified to present an arc flash potential. The clothing will be rated for the arc flash potential of the task. Such clothing may include long sleeved FR shirts, FR pants, face shield, and appropriate class rubber gloves. The employee shall not wear synthetic fiber clothing under Fire Resistant clothing. Refer to the Electrical Safety and Arc Flash policy for clothing required for arc flash potential posed by the task and equipment.

EYE AND FACE PROTECTION

To prevent possible eye and face injuries suitable eye protection shall be worn. Potential eye and face injuries occur from flying objects, liquid chemicals, acids or caustic liquids, molten metal, chemical gases or vapors, and light radiation. Eye protection shall provide adequate protection, be reasonably comfortable, fit snugly, be durable, capable of being disinfected and cleaned, kept sanitary and in good repair. When selecting eye and face protection consider what kind and degree of hazard is present.

Eye or face protection shall comply with American National Standards Institute (ANSI) Z87.1. If you have questions about eye or face protection ask your supervisor or refer to the manufacture instructions.

FOOT AND LEG PROTECTION

Most foot injuries occur from employees not wearing protective footwear. The typical foot injury is caused from objects falling fewer than 4 feet. For protection from falling or rolling objects, sharp objects, molten metal, hot surfaces, and slippery surfaces, employees shall use appropriate foot guards, steel toe safety shoes, steel toe safety boots, metatarsal guards and leggings. Leggings protect the lower leg and feet from molten metal and welding sparks.

Leather work shoes/boots are required and safety shoes are recommended for use by all employees. Safety shoes should be sturdy, have an impact resistant toe, and have puncture resistant soles. Protective footwear shall comply with ANSI Z41-1991.

When working with wet concrete, workers shall wear rubber boots.

Shoes and boots shall be kept in good repair, and those with worn heels of thin or worn soles should not be permitted. In addition, the wearing of sneakers, sandals, or shoes that have been slit or have holes cut in them, shall not be permitted.

HAND AND ARM PROTECTION

Arm and hand protection is used to prevent skin contact and absorption with potentially harmful materials, to prevent burns, and electrical shock. Where needed, workers should wear work gloves in good condition, which are suited to the type of work involved. Some of the factors taken into account when gloves were selected are the toxic properties of chemicals handled by employees, the degree of dexterity required, duration, frequency, degree of exposure to the hazards, and physical stress that will be applied. The company relies on the manufacturers' standard test procedures for hand and arm protection performance characteristics. Refer to Attachment C for guidelines for glove selection.

Employees who are required to operate or work around drill presses, power saws, and similar rotating machinery shall not wear gloves.

Special type gloves such as neoprene or rubber to handle chemicals shall be issued to those employees who have a need for them. Welders shall wear gloves during settling operations.

HEAD PROTECTION (HARD HATS)

Employees shall wear protective helmets when working in areas where there is a potential for injury to the head from falling objects. Protective helmets designed to reduce electrical shock hazard shall be worn by each such affected employee when near exposed electrical conductors which could contact the head.

All employees that wear company issued hard hats shall wear them at all times when working on construction projects or areas of an existing facility, which has been designated as a "Hard Hat Area." This includes visitors, subcontractors, engineers, inspectors, and anyone else who has authorization to be on the project site.

Head protection shall be worn properly with the brim in front. Hard hats which have been altered by drilling or cutting will not be permitted, nor will those hats which have been altered by the addition of any items on the outside of the hat other than safety, or site stickers. When it is necessary to use additional personal protective equipment, which shall be attached to the hard hat, only those hard hats designed for this purpose may be used.

Protective hard hats shall meet ANSI requirements Personal Protection-Protective Headgear for Industrial Workers Z89.1-1986. Electrical workers shall wear hard hats that are rated for the voltage of the equipment where work is being performed.

RESPIRATORY PROTECTION

Company issued respiratory protective devices, appropriate for the hazard, shall be used where airborne contaminants, such as fibers, dust, smoke, vapors, and mists exist and may exceed acceptable levels. Respiratory protective devices will be used in accordance with NIOSH requirements.

HEARING PROTECTION

Hearing protection shall be worn in areas that exceed 85 dBA. Refer to 28, Occupational Noise Exposure Program.

FULL BODY HARNESS AND LANYARDS

Harnesses with lanyards in use, shall be worn by all employees who are working at elevated levels which are not protected by standard handrails, or when working from suspended scaffolds. Employees are required to wear and use full body harnesses to protect them from falling when they are exposed to falls from heights of six feet or more. If they are working on powered platforms or over machinery, moving equipment or objects posing an impalement hazard, or in the case of entering a confined space, with an attended lifeline, 100% full protection is required. This might include the need for two lanyards per belt. All harnesses and lanyards shall be inspected and each inspection documented with the harness serial number. Inspections shall be performed by supervision. Quick release belts shall only be used when working over bodies of water. Lanyards shall have locking snaps that require two actions to open. Refer to the Fall Protection Program for complete requirements.

FLOTATION VESTS

US Coast Guard approved flotation vests shall be worn by all employees when working on barges, floating pipelines or plants, or on structures extending over water, that are not protected by adequate standard handrails. In addition, any employee who is working over the side of a vessel or structure, which is extended over water, or, in any area where a drowning hazard exists, shall wear an approved flotation vest.

TRAFFIC VESTS

Employees shall wear, as a minimum, an ANSI Class II fluorescent orange or lime traffic safety vest when working within 15 feet of a roadway or in a parking lot. Vests shall also be used when directing traffic on a construction site.

ELECTRICAL PROTECTION

- Employees working in areas where there are potential electrical hazards will be provided with, and use, electrical protective equipment that is appropriate for the specific parts of the body to be protected and for the work to be performed.
- Equipment will be maintained in a safe, reliable condition and will be periodically inspected and/or tested. If the insulating capability of protective equipment may be subject to damage during use, the insulating material shall be protected. (For example: An outer covering of leather used for the protection of rubber insulating material.)
- Employees will wear nonconductive head protection wherever there is a danger of head injury from electric shock or burns due to contact with exposed energized parts.
- Employees will wear protective equipment for the eyes or face wherever there is danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from electrical explosion.
- Each employee will use insulated tools or handling equipment if they might make contact with conductors or parts. If the insulating capability of insulated tools or handling equipment is subject to damage, the insulating material must be protected. Ropes and handlines used near exposed energized parts must be nonconductive.
- Protective shields, protective barriers, or insulating materials will be used to protect each employee from shock, burns, or other electrically related injuries while that employee is working near exposed energized parts.

When normally enclosed live parts are exposed for maintenance or repair, they must be guarded to protect unqualified persons from contact with the live parts. Tim Foster utilizes alerting techniques used to warn and protect employees from hazards which could cause injury due to electric shock, burns or failure of electric equipment parts. (Alerting techniques can take the form of safety signs and tags, barricades & attendants.)

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. has implemented this policy to prevent or minimize the consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals, and to ensure no employee is exposed to toxic or hazardous material at levels above the permissible exposure limits.

REFERENCES

- §1910.119 – Process Safety Management of Highly Hazardous Chemicals
- §1910.1200 – Hazard Communication Standard

RESPONSIBILITIES

Employer Responsibilities

- Developing a written plan of action to implement employee participation required by PSM
- Consulting with employees and their representatives on the conduct and development of the process hazard analysis (PHA) and on the development of the other elements of process management
- Training each employee presently involved in operating a process or a newly assigned process in an overview of the process and in its operating procedures
- Responding quickly to eliminate workplace hazards
- Ensuring all equipment is kept in good repair
- Ensuring employees follow safe job procedures
- Reviewing process hazard analysis whenever there is a significant change to any element of the job or there has been an injury or illness
- Teach employees about the hazards of their jobs, specifically any: potential fire, explosions, or toxic release

Safety Committee Responsibilities

- Assist in process hazard analyses as necessary
- Assist in training employees to recognize and control workplace hazards
- Monitor the workplace for hazards
- Encourage employees to report hazards
- Implement appropriate controls
- Ensure corrective action is taken promptly

Employee Responsibilities

- Assist in process hazard analyses
- Follow safe job procedures
- Report hazards to a supervisor immediately

TRAINING

Employees will be told that the purpose of PSM is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable, or explosive chemicals in various industries such as refineries, etc. Each employee will be trained in the overview of the process and its operating procedures for every process they are involved in or newly assigned to. The training will emphasize the process's specific safety and health hazards, emergency operations, shutdown, and other applicable safe work practices.

MPC, Corp. will document the identity of the employee (permanent or contract), the date of training, and the means used to verify that the employee understood the training.

Hazard communication will cover known workplace hazards, including how to avoid and abate them. MPC, Corp. employees are required to abide by all company safety policies, procedures, and their supervisor's instruction. Contract employees must be advised of all hazards to which they may be exposed in the workplace.

PROCEDURES

Process safety information

Tim Foster will compile all written process safety information before conducting any PHA. The compilation will be completed under the same schedule required for the PHA. The PHA will include information on: the hazards of the chemicals used or produced by the process; the technology of the process; the equipment in the process.

Safety Data Sheets (SDS) meeting the Hazard Communication Standard requirements may be used to comply with information on the hazards requirement to the extent they contain the required information.

Process hazard analysis

Prior to starting work, Tim Foster will perform a job hazard assessment (PHA) of the worksite. Immediately upon completion of the hazard assessment, Tim Foster will make their customer, employer, or owner of the host facility / jobsite aware of any hazards identified and unique hazards presented by work being performed by MPC, Corp..

The PHA will focus on equipment, instrumentation, utilities, human actions (routine and non-routine), and external factors that might impact the process. The PHA team will determine and document the priority order for conducting PHAs that includes such considerations as the extent of the process hazards, the number of potentially affected employees, the age of the process, and the operating history of the process.

Standard operating practices (SOPs)

Operating procedures describe tasks to be performed, data to be recorded, operating conditions to be maintained, samples to be collected, and safety and health precautions to be taken. The procedures will be accurate, understandable to employees, and revised periodically to ensure that they reflect current operations. Tim Foster will use the process safety information package as a resource to better ensure that the operating procedures and practices are consistent with the known hazards of the chemicals in the process and that the operating parameters are accurate.

SOPs will be written so that an experienced operator not familiar with a particular process unit could run the unit with minimal supervision or help from other operators, or the least experienced operator released for unsupervised work could run the unit.

MPC, Corp. employees will abide by employers safety work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.

Pre-start-up safety review

The initial start-up procedures and normal operating procedures need to be fully evaluated by Tim Foster and the work team as part of the pre-start-up review to ensure a safe transfer into the normal operating mode for meeting the process parameters. Piping and instrument diagrams (P&IDs) are to be completed along with having the operating procedures in place and the operating staff trained to run the process before start-up. Any incident investigation recommendations, compliance audits, or PHA recommendations need to be reviewed as well to see what impacts they may have on the process before beginning the start-up.

Mechanical integrity program

Tim Foster will establish and implement written procedures to maintain the ongoing integrity of process equipment. Elements of a mechanical integrity program include the identification and categorization of equipment and instrumentation, inspections and tests, testing and inspection frequencies, development of maintenance procedures, training of maintenance personnel, the establishment of criteria for acceptable test results, documentation of test and inspection results, and documentation of manufacturer recommendations as to meantime to failure for equipment and instrumentation.

Hot work permit

A permit must be issued by Tim Foster for hot work operations conducted on or near a covered process. Contractors shall not perform hot work until a hot work permit is obtained from the hiring client. The permit must document that the fire prevention and protection rules for welding, cutting, and brazing have been implemented before beginning. It must also indicate the authorized dates and identify the object to be worked on. The permit will be kept on file until completion of the hot work operations.

Management of change

Tim Foster will prepare written procedures to manage changes (except for “replacements in kind”) to process chemicals, technology, equipment, operating procedures, and facilities that affect a covered process. Changes in documents, such as P&IDs, raw materials, operating procedures, mechanical integrity programs, electrical classifications, etc., need to be noted so that these revisions can be changes need to be kept in an accessible location to ensure that design changes are available to operating made permanent when the drawings and procedure manuals are updated. Copies of process personnel as well as to PHA team members when a PHA is being done or one is being updated.

Employees involved in operating a process and maintenance whose job tasks will be affected by a change in the process shall be informed of, and trained in, the change prior to start-up of the process or affected part of the process.

The following items will be included in the management of change proposal:

- Technical basis for the change
- Impact of the change on health and safety
- Modifications to operating procedures
- Necessary time period for the change
- Authorization requirements for the proposed change

Incident investigation

Incident investigation is the process of identifying the underlying causes of incidents and implementing steps to prevent similar events from occurring. The intent of an incident investigation is for employers to learn from past experiences and thus avoid repeating past mistakes. The incidents for which OSHA expects employers to become aware and to investigate are the types of that result in or could reasonably have resulted in a catastrophic release. Some of the events are sometimes referred to as “near misses,” meaning that a §1910.119 – consequence did not occur but could have.

Incidents which have resulted in or could reasonably have resulted in a catastrophic release of highly hazardous chemical in the workplace shall be investigated within 48 hours of the incident.

All workers are required to report incidents and near misses to their supervisors. All incidents and near misses will also be immediately reported to the host employer.

A report will be prepared at the conclusion of the investigation. The employer will establish a system to promptly address and resolve the incident report findings and recommendations. The report will be reviewed with all affected personnel and retained for five years.

Emergency planning and response

Address what actions employees are to take when there is an unwanted release of highly hazardous chemicals. Tim Foster will select how many different emergency preparedness procedures or lines of defense are needed and then develop the necessary plans and procedures, appropriately train employees in their emergency duties and responsibilities, and then implement these lines of defense.

COMPLIANCE AUDIT

Tim Foster or an assembled trained team of people will audit the PSM system and program. A small process or plant may need only one knowledgeable person to conduct an audit. The audit is to include an evaluation of the design and effectiveness of the PSM system and a field inspection of the safety and health conditions and practices to verify that the employer's systems are effectively implemented. The audit will be conducted or lead by a person knowledgeable in audit techniques and impartial toward the facility or area being audited. The essential elements of an audit program include planning, staffing, conducting the audit, evaluation and corrective action, follow-up, and documentation.

TRADE SECRETS

MPC, Corp. employees are instructed in the confidentiality of trade secret information, and the disciplinary action which will be a consequence of violation of confidentiality.

CONTRACTORS

When MPC, Corp. is the contractor:

- MPC, Corp. employees will abide by employers safety work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.
- MPC, Corp. employees will not perform hot work until a hot work permit is obtained from MPC, Corp.'s employer and/or the owner of the host facility / jobsite. The permit will document that provisions of §1910.252(a) have been met.
- MPC, Corp. will respect the confidentiality of trade secret information when the process safety information is released to them.
- MPC, Corp. will tell the employer of any hazards it found or created in the course of the work.

MPC, Corp. will develop a written procedure for managing contractors that perform maintenance or repair, turnaround, major renovation, or specialty work on or adjacent to a covered process. Such procedures will not apply to contractors providing incidental services that do not influence process safety, such as janitorial, food and drink, laundry, delivery, or other supply services. Ensure that each contract employee is trained in the work practices necessary to safely perform his or her job

Tim Foster will ensure each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process and the applicable provisions of the Emergency Action Plan.

TRAINING RECORD

Trainer:	
Signature:	
Date:	
Content of Training:	
Attendees	
Print Name:	Signature:

POLICY

MPC, Corp. has adopted this policy for Subcontractor Management from industry standards and best practices.

RESPONSIBILITIES

Tim Foster is the assigned Company Supervisor responsible for ensuring the following procedures, practices, and rules are implemented and enforced.

PROCEDURES

Prequalification

Tim Foster will ensure that all prospective subcontractors be pre-qualified through the review of their safety programs, safety training documents, and safety statistics. Proposed subcontractors will complete and submit a Contractors Prequalification Form from which a Subcontractor/Supplier Quality Rating Report will be completed. The Contractor's Prequalification Form must be complete and all requested attachments provided.

Selection

Tim Foster will utilize acceptable safety matrixes to be used as a criteria for selecting subcontractors and will be based upon several considerations including but not limited to:

- Prior working relationships
- Quality Rating Report scores such as: TRIR, EMR, DART
- Audits of current work in progress
- Availability of contractors in the area

The contractor that receives the best overall review will be forwarded to the Owner's representative for review and approval.

Pre-Job

The selected subcontractor will provide a training matrix with individual employee names and the areas of completed training for employees. The subcontractor will also identify Competent Persons and the areas of their competency. The subcontractor will be included in pre-job meetings or kick-off meetings, and safety orientations.

On-Site

The subcontractor will notify MPC, Corp. Site Safety a minimum of 24 hours prior to the arrival of new employees on-site so that arrangements can be made to provide the required orientations. Employees must meet all of the requirements of the Site Safety Plan, including the training and orientation.

The Subcontractor will be required to meet all hazard analysis requirements and request the safe work permits as required by this plan. The subcontractor will be included in the audits and inspections on-site and are expected to immediately correct any “At Risk” behaviors or hazards identified that are within the subcontractor’s scope of work and ability to correct. Employees of subcontractors have the right to refuse any work they deem to be hazardous.

All subcontractors will be included in tailgate safety meetings, job safety analysis or hazard assessments, and on-the-job safety inspections.

The subcontractor will be required to adjust their “Safe Work Practices” in order to prevent excessive Near Hits and/or Near Misses. If the subcontractor is unable to perform their scope of work without “At Risk” behavior or creating hazardous working conditions on the site, the subcontractor’s working element will be required to leave the site until an abatement plan can be prepared and agreed upon.

Injury/Illness Recordkeeping

MPC, Corp. will ensure that all subcontractors follow the MPC, Corp. policy on Injury and Illness Recordkeeping. The only exemption to this requirement is if the subcontractor already has an Injury and Illness Recordkeeping policy in place that is more stringent than the one used by MPC, Corp..

Post-Contract

Upon completion of the work, a post-job subcontractor safety performance review and evaluation will be completed to determine the safety performance of the subcontractor and provide reference for future job consideration.

Management of Change

MPC, Corp. will conduct a hazard assessment when a change occurs in the construction plan or external influences impact the manner in which the work will be conducted. This includes, but is not limited to:

- Changes in policy or objectives
- Operating licenses and permits, legal, and regulatory requirements
- Changes in procedures, practices, and rules
- Changes to controlled documentation
- Work processes or methods
- Changes other than exact replacement in kind to equipment, processes, hardware, or software
- Changes to operating boundaries; e.g. operating envelopes
- Temporary changes that specify the period of time a change will be in effect

All employees affected by any temporary or permanent operational changes will be informed and trained in prior to the start of any new work.

The management of change process covers all activities including the initial request, implementation, review, and closure of a change. Any proposed changes will be managed by Tim Foster and forwarded, in writing, to the Owner's management for approval or disapproval.

The following items will be included in the management of change proposal:

- Technical basis for the change
- Impact of the change on the health and safety of personnel
- Impact of change on the supplied tools and equipment
- Necessary modifications to existing or new operating procedures
- Methodology used to analyze the impact of the change

When revisions are necessary, affected employees will be consulted regarding the development and implementation of the newly revised procedures.

OPEN LETTER TO ALL SUBCONTRACTORS

Date: _____

Greetings Prospective Subcontractor:

As part of MPC, Corp.'s continuing commitment to safety, we are assessing our potential subcontractors' compliance with all applicable safety requirements. Enclosed are the materials you will need to complete this process, including a questionnaire that will assist us in assessing your safety programs. We are asking all subcontractors "Invited to Bid" to complete the attached questionnaire. The matrix included in this package is designed to assist you in determining which programs are applicable to your operations.

Please contact me _____ or _____ with any questions or concerns.

I am in and out of the office so please leave me a voice mail and I will get back to you when I return.

Please forward the completed forms and attach a copy of your safety manual by: _____

TO:

Company	_____
Attn	_____
Address	_____
City/State/Zip	_____
Phone	_____
Fax	_____
Email	_____

Regards,

Construction Manager

SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 1 OF 4)

Company Name		Number of Employees		Date	
Address					
City		State		ZIP	
Telephone #	()	Fax #	()		
Form Completed By					
Officer Name and Signature					
Please describe the services that your Company provides					
					YES NO
1. Has your Company received any inspections from a regulatory agency in the last three (3) years?					☐ ☐
If yes, provide details					
2. Has your Company received any citations from a regulatory agency during the last three (3) years?					☐ ☐
3. Does your Company have regularly scheduled, documented employee safety meetings? (Tailgate/Toolbox)					☐ ☐
If yes, how often					
What is covered at safety meetings?					
4. Does your Company perform equipment checks on all equipment?					☐ ☐
If yes, are records maintained?					☐ ☐
5. Does your Company perform Job Hazard Analysis (JHA)?					☐ ☐

SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 2 OF 4)

6. Does your Company provide and require employees to use the following Personal Protective Equipment (PPE)?					
Hard Hats				☐	☐
Safety Shoes/Boots				☐	☐
Eye and Face Protection				☐	☐
Hand Protection				☐	☐
Hearing Protection				☐	☐
Fall Protection				☐	☐
Respiratory Protection				☐	☐
7. In addition to regulatory required Personal Protective Equipment, what other PPE is required or supplied?					
If any, please list					
8. Indicate the circumstances in which your Company's employees may be subject to alcohol/drug screening					
☐	Never	☐	Reasonable Cause/ Suspicion	☐	Periodic
☐	Random	☐	Post Accident	☐	Follow-Up
☐	Return to Duty	☐	Other		
Do you have a documented Substance Abuse Prevention Program available for review?					☐ ☐
9. Does your Company have a policy requiring written accident/incident reports (injuries, property damage, etc.)?					☐ ☐
10. Does your Company document, investigate, and discuss "Near Miss Incidents"?					☐ ☐

SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 3 OF 4)

11. Please respond to all items below with YES, NO, or N/A (not applicable). Do not leave any items unanswered.

OSHA Programs/Training	Program Written and Documented?	Training Conducted By (In-House or Outsourced)	Frequency of Employee Training	Documented Individual Employee Training?
OSHA Programs				
Confined Spaces				
Electrical Safety (qualified)				
Electrical Safety (non-qualified)				
Excavation and Shoring				
Fire Protection and Prevention				
Fall Protection				
First Aid/CPR				
HAZCOM				
Heat Stress Prevention				
Lifting/Mobile Equipment				
Lockout/Tagout				
Noise/Hearing Conservation				
PPE				
Respiratory				
Scaffolds/Ladders				
Trenching/Shoring				
Welding, Cutting, and Hot Work				

SUBCONTRACTOR SAFETY AND HEALTH QUESTIONNAIRE (PAGE 4 OF 4)

12. Please provide any additional information on other industry-specific programs or training, including written procedures, which your Company provides to employees	
13. Does your Company have a Safety and Health Program with clearly written safety policy that is endorsed and enforced by upper management?	☐ ☐
14. Does your Company perform documented safety audits/reviews?	☐ ☐
15. Who in your Company is responsible for coordinating your health, safety, and environmental program?	
16. If your Company has more than ten (10) employees, please attach with this questionnaire your Company's OSHA 300 Log for the last three (3) years.	
17. Does your Company use subcontractors?	☐ ☐
If yes, explain	
Are your Subcontractor's written safety programs and procedures available for review?	☐ ☐
18. Are all documents and records pertaining to this questionnaire available for audit?	☐ ☐
If no, explain	
19. Please attach your current/completed Health and Safety Program along with other written safety programs for review. A disk or CD-ROM is acceptable.	
Comments	

SAFETY CONTRACT

Following are Safety Requirements as stated in your subcontract agreement: Subcontractor agrees to comply with prevailing safety regulations, whether OSHA, Contractor Policies, Owner Policies, or otherwise imposed while working on the project. Subcontractor also agrees to be bound by any rule or regulation needed during the course of the project. Subcontractor further agrees:

- To provide a safe work area to all his employees by providing, and requiring the use of, the required Personal Protective Equipment such as: hard hats, safety glasses, respirators, dust masks, face shields, etc
- Subcontractor’s employees shall wear long or short sleeve shirts, long pants, and sturdy work shoes, boots, or when required, steel-toed boots
- To provide this Contractor with proper documentation on employee training for specific tools and equipment such as powder actuated tools, air guns (nail guns), forklifts, scaffolding, scissors lifts, boom lifts, and any safety plan applicable to their scope of work
- Be responsible for implementing and administering their safety program and must provide a copy of said program to this Contractor including a Job Hazard Analysis (inspections) and documentation on weekly job site safety meetings with its employees
- To implement daily hazard recognition for its employees by using a Pre-Task Planner form for their daily scope of work
- To provide its employees with safe tools and equipment and to safely perform the work under this agreement with high regard for the safety of its employees and others
- To provide a designated person for a weekly contractor safety coordination meeting

Subcontractor shall:

- Immediately report to this Contractor in writing and remedy any accidents/illness, near misses, or unsafe conditions brought to its attention or discovered by subcontractor employees, involving its work and/or posing a danger to persons or property
- Not permit its employees at the project to use publicly audible radios or to wear headsets except as are used for job site communications
- Prior to bringing on site a substance or material for which a Safety Data Sheet (SDS) is required by federal, state, and local regulations, subcontractor shall provide said SDS to Contractor

This Contractor is a Drug-free Company and provides such a workplace for its employees.

Subcontractor shall provide this Contractor, prior to beginning scope of work, with current documentation of subcontractor’s drug testing policy or program (i.e. pre-hire and random testing). The subcontractor will conduct random drug testing for all of their employees throughout the course of the project. All subcontractors’ employees shall attend a Project Safety Orientation on the first day of work on the job site.

Subcontractor Name	Signature	Title	Date
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DISCLAIMER

OSHA's "Safety and Health Regulations" are continuously being reinterpreted. Therefore, Safety Services Company is unable to completely guarantee the exactness of the information conveyed in this publication. Safety Services Company assumes no responsibility and shall be held harmless for any inaccuracies or omissions contained within this manual and shall not be held liable to any extent or form for any injury or loss resulting from the manner in which this information is interpreted and/or applied.

Careful effort has been dedicated in order to provide a simplified, understandable explanation of OSHA regulations based on currently available information. This "Safety and Health Manual" is distributed with the agreement that Safety Services Company is not employed in providing legal or other specialized business services. Should expert assistance be required, retain the services of a competent professional.

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NOTES

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EMPLOYEE SIGNOFF

This is to certify that I have received a copy of the Company Health, Safety and Environment Manual.
I have read these instructions, understand them, and will comply with them while working for the Company.

I understand that failure to abide by these rules may result in disciplinary action and possible termination of my employment with MPC, Corp.

I also understand that I am to report any injury to my foreman or superintendent immediately and report all safety hazards.

I further understand that I have the following "Safety Rights":

- I am not required to work in any area I feel is not safe.
- I am entitled to information on any hazardous material or chemical I am exposed to while working.
- I will not be discriminated against for reporting safety concerns.

Employee Name	Signature	Date
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Supervisor Name	Signature	Date
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cc: Employee File