

# SAFETY MANUAL



At Waco, our careers are made by what we produce. Productivity and quality are important to us, and we don't have to sacrifice that for the sake of safety. We only have to make safe work practices a habit, and habits must be learned. We learn these habits in our took-box safety meetings every week. We learn in our training sessions, and by becoming knowledgeable with Instructions, Safety Manuals and Regulations. We also learn from applying good common sense thinking as we work every day.

It is the policy of Waco, Inc. to establish and maintain an effective accident prevention and safety program on every jobsite.

The President, through his key personnel, is directly responsible for the Company Safety Program. The Vice Presidents and Branch Managers are responsible for implementing Waco's Safety Program within their operations. They will personally investigate and file accident investigation reports on any second accident caused by the same individual within 60 days of any serious or suspicious accidents.

Daniel M. Walker

Daniel M. Walker President



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	WACO, INC.		Doc No:	ABRASIVE
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Safety Management System		Revision Date:	02/01/2024	
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ABRASIVE BLASTING			Next Review Date:	02/01/2025
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The purpose of this program is to provide safe guidelines for the operation and maintenance of abrasive blasting equipment and their related components for WACO, INC.

#### Scope

This program covers all employees involved in abrasive blasting jobs. Whenever hazardous substances such as dusts, fumes, mists, vapors, or gases exist or are produced in the course of construction work, their concentrations shall not exceed the limits specified in the "Threshold Limit Values of Airborne Contaminants – 1970" of the American Conference of Governmental Industrial Hygienists. When ventilation is used as an engineering control method, the system shall be installed and operated according to the requirements of 1926.57 (Ventilation).

#### **Key Responsibilities**

#### **Supervisors**

- Be aware of potentially hazardous conditions that may arise during the blasting process prior to starting any blasting job and must take measures to protect employees.
- Ensure that all employees are trained on related safety topics.
- Understand the importance of regularly scheduled maintenance for continued safe operation of blast equipment. Ensure that all employees comply with this policy and all other related policies.

#### **Blast Employees**

- Be familiar with the safe operating functions of blasting equipment to be used on a job.
- Comply with all Waco, Inc. policies.
- Have knowledge of hazards associated with respirable silica.
- Understand they are prohibited from using compressed air for cleaning unless the pressure is reduced to less than 30 pounds per square inch and be equipped with effective chip guarding and proper PPE.

#### Procedure

#### General

Abrasives and the surface coatings on the materials blasted are shattered and pulverized during blasting operations and the dust formed will contain particles of respirable size. The composition and toxicity of the dust from these sources shall be considered in making an evaluation of the potential hazards.

Dust shall not be permitted to accumulate on the floor or on ledges outside of an abrasive blasting enclosure. Dust spills shall be cleaned up promptly. Aisles and walkways shall be kept clear of steel shot or similar abrasives which may create a slipping hazard.

#### Equipment Handling

Follow these guidelines when moving blasting equipment to prevent back strains and crushing injuries:

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- Use a forklift, crane or other type of lifting device for transporting a blast machine; always use a lifting device when the machine contains abrasive.
- Never manually move a blast machine where abrasive has been spilled on hard surfaces or on a wet or slippery surface.
- Never attempt to manually move a blast machine containing abrasive.
- Always disconnect hoses from machines to avoid interference during moving.

#### Air Compressors

- Air compressors must be located in a well-ventilated area. It must be able to contain large volumes of clean, toxicant-free air. This means the compressor must be placed up wind from the blasting operation and out of the range of dust and flying abrasives.
- Due to the high pressure that air compressors create, precautions must be taken to prevent unleashing of strong forces that can cause serious bodily injury.
- Air for abrasive blasting respirators must be free of harmful quantities of dust, mists, or noxious gases and must be inspected daily, prior to use and comply with CFR 1910.134(I) (Respiratory Protection).
- Never adjust the pressure setting on a compressor above the blast equipment maximum working pressure rating. The maximum working pressure rating is indicated on the manufacturer's metal identification plate.

#### Blast Pot

- Position blast pots and/or compressors on level ground. Machines operate best when they sit on level surfaces.
- For communication purposes place blast pot between the compressor and the surface to be blasted. This will enable the pot tender and operator to make visual contact.
- All couplings and pipefitting on the blast pot, compressor and hoses must be airtight.
- Blast pots must be inspected daily prior to use.

# **Hoses and Connectors**

- Couplings must have safety wires in place and be secure as required by federal safety regulations. The operator shall be responsible to ensure that each coupling has safety wires in place.
- Whip checks must be installed at bull hose connections.
- Operator should hold onto the blast hose until the air pressure from the nozzle drops off to zero.
- Do not use hoses with soft spots.
- Never use tape to repair a blown-out hose.
- Immediately replace a hose if a blowout or leak occurs.
- Hose ends must come into contact with coupling gaskets to prevent leaks and to maintain static electricity conductivity.

#### **Nozzles and Remote Controls**

- Blast nozzles shall be bonded and grounded to prevent the buildup of static charges. Where flammable or
  explosive dust mixtures may be present, the abrasive blasting enclosure, the ducts, and the dust collector
  shall be constructed with loose panels or explosion venting areas, located on sides away from any
  occupied area, to provide pressure relief in case of explosion following the principles set forth in the
  National Fire Protection Association Explosion Venting Guide. NFPA 68-1954.
- Organic abrasives which are combustible shall be used only in automatic systems.

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- Blast cleaning nozzles shall be equipped with an operating valve which must be held open manually. A support shall be provided on which the nozzle may be mounted when it is not in use.
- All blast machines must be equipped with remote control systems to start and stop the blasting process.
- Never tape, strap, or tie down an air actuated remote control lever or choke electric remote control switch.
- If there is the slightest delay in reaction time of the handle lever or lever lock to open, check for dust and dirt build-up around pivot pins before resuming blasting. Also, test the tension on the lever springs, and replace them immediately if they do not respond rapidly.
- Substituting component pieces with other manufacturer's parts is not allowed.
- Inspect blast nozzles for wear and cracks on the inner liner. When a nozzle orifice is worn 1/16" larger than its original size, it should be replaced.
- Check nozzles and nozzle holders for deterioration of thread form. Threads on nozzles and their companion holders must not be cross-threaded, worn or distorted.
- Hoses that are being tied and lifted to blasting operations being conducted above grade, i.e., scaffolds, shall be depressurized to prevent accidental start-up.

#### **Operator Signals**

- On the job site, voice communication is often impossible. Even shouts cannot be heard over the noise of compressors and blasting. In addition, the operator's head will be enclosed in the helmet, which blocks out sound and limits vision. For these reasons, an industry wide standard set of hand and sound signals has been developed.
- Signals may be visual hand movements, flashing light, pulls on a rope or sounds made by banging a hammer or using a horn or electric buzzer.
- Every operator must become familiar with the signals to be used on the jobsite.

#### **Respirator Use**

- A specific work-site procedure shall be developed where respirators or CE blasting hoods/helmets are required to protect the health of the operator. A respiratory protection program shall be established wherever it is necessary to use respiratory protective equipment including worksite specific procedures and elements for required respirator use. Abrasive blasting respirators shall be worn by all abrasive blasting operators under certain conditions.
- Equipment for the protection of eyes, face and body shall be supplied to the operator when the respirator design does not provide such protection and to any other personnel working in the vicinity of abrasive blasting operations. This equipment shall conform to the requirements of 1926.102 (Eye and Face Protection).
- Equipment for protection of the eyes and face shall be supplied to any other personnel working in the vicinity of abrasive blasting operations.

#### **Environmental Controls**

- Organic abrasives which are combustible shall be used only in automatic systems. Where flammable or explosive dust mixtures may be present, the construction of the equipment, including the exhaust system and all electrical wiring, shall conform to the requirements of American National Standard Installation of Blower and Exhaust Systems for Dust, Stock, and Vapor Removal or Conveying, Z33.1-1961 (NFPA 91-1961), and Subpart S of 1926.57 (Ventilation).
- The work area must be inspected for exterior electrical power lines that may endanger operators.

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- Operators should use care to avoid directly blasting power lines and insulators.
- Do not blast in atmospheres that contain flammable fumes.
- Take precautions at the work site to eliminate hazardous surface obstacles that may cause tripping hazards or interfere with worker mobility.
- Adequate ventilation must be provided for employees working within enclosures.
- Never operate compressor if hoses are frozen. When winter temperatures drop below freezing, check for ice prior to pressurizing hoses.
- Provide adequate drinking water for operators, especially during summer.

#### Personal Protective Equipment

- Secure hoses by tying them to scaffolding or personnel platforms, when working from elevations, to prevent injury from hoses falling on other personnel working below or near blasting area.
- Before using any blasting abrasive, check the MSDS to find out the chemical composition of the abrasive material.
- Equipment for the protection of eyes, face and body shall be supplied to the operator when the respirator design does not provide such protection and to any other personnel working in the vicinity of abrasive blasting operations. This equipment shall conform to the requirements of 1926.102 (Eye and Face Protection).
- Ventilation systems and dust collectors may be necessary in enclosed conditions.
- Noise from abrasive blast nozzles can be loud enough to damage the hearing of blasters and others on the work site. Workers must not be exposed to noise levels exceeding 80 decibels as an eight-hour time weighted average (80 dBA TWA), therefore all blasters shall wear earplugs.
- Blaster must wear heavy-duty gloves and steel toe boots.
- Helmet lenses should be changed as soon as pitting or frosting takes place.

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# **ABRASIVE BLASTING CHECKLIST**

Location: \_\_\_\_\_\_ Lead Person at Jobsite: \_\_\_\_\_\_

Yes No N/A

# **Worksite Environment**

	Has a hazardous blasting zone been established at the job site that includes the blast area and areas
	where dust concentrations may exceed OSHA's permissible exposure limits?

Has the composition of the materials to be blasted been investigated for lead, asbestos and other
heavy metals and toxics?

Have electrical lines and hoses in the blast area been identified and protected from blasting
operations?

			Has the atmosphere in the work area	been tested to ensure	that it will be safe to breath?
--	--	--	-------------------------------------	-----------------------	---------------------------------

	Have all the work surfaces been inspected, holes covered, water and other liquids removed, and ice,
	snow and other slippery surfaces controlled?

		Are air movers and vacuum/dust collectors	being use	ed to provide	e clear visibility	for the blasters?
			being use	ca to provia	cical visibility	for the blusters.

	Is hearing protection available for personnel exposed to greater than 80 dBA and double hearing
	protection available to those exposed to greater than 100 dBA?

# Air Supply

	If an oil lubricated compressor is used for breathing air, is it equipped with a high temperature and
	carbon monoxide alarm?

- If an oil lubricated compressor is used for breathing air, has the air quality been tested within the last quarter to determine that it meets the CGA standard for "Grade D " breathing air?
- If an air compressor or pump is used for breathing air, is it positioned so that the air intake is positioned to prevent the ingestion of engine exhaust or other toxic gases, vapors or fumes?

Is the compressor or air pump and air lines shutoff and depressurized prior to performing
maintenance?

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ADRASIVE DLASTING			Next Review Date:	02/01/2025
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Yes N	•	
Airlin		Have the airlines and connections been inspected for wear and damage and been repaired, prior to use?
		Have the gaskets for each connection been inspected and replaced if worn, distorted or too soft?
		Are airlines laid out so that they will not obstruct workers?
		Are safety pins and whip checks installed on all connections?
Abra	sives	
		Are appropriate NIOSH approved respirators being used during blasting and cleanup?
		Are mechanical lifting devices used to assist in loading and handling abrasives?
		Does the abrasive contain less than 1% crystalline silica?
		Has the Material Safety Data Sheet (MSDS) been reviewed for the blasting agent and hazardous compounds?
Blast	ing N	lachine
		Have all fittings and valves been checked for tightness and found to be in good operating condition?
		Have damaged gaskets and parts been replaced?
		Has the machine been inspected for dents and other damage?

# Abrasive Metering Valve

Does the valve handle move freely for accurate adjustment of abrasive flow?

# **Remote Controls**

- □ □ Is the blast machine equipped with a remote control system? OSHA 29 CFR 1910.244
- Is the remote control handle allowed to be strapped, taped, wired, or otherwise secured in a position that will interfere with the movement of the lever?

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Yes No N/A								

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□ □ □ Is the abrasive trap cleaned at least twice each shift to avoid restriction in the air exhaust?

#### **Pressure Regulators**

Are pressure regulators specifically designed for nozzle air volumes and pressures per the manufacturer's recommendations?

# **Screens & Covers**

- □ □ □ Is a screen used to keep debris out of the blast machine?
- □ □ □ Is a cover used to protect the entry of moisture when not in use?

# Blast Hose & Couplings

- - -

			Are the couplings inspected daily for damage prior to use?
--	--	--	--

- Are hoses inspected daily for wear and soft spots?
- Are couplings wired together and whip checks installed to prevent disengagement and whipping?
- □ □ Is static dissipating hose used to prevent the buildup of static electricity?
- Is the size of the blast hose 3 to 4 times the size of the nozzle orifice to prevent premature hose wear?
- Are hoses laid out in long curves to reduce premature wear and blowouts?

# Nozzles

- □ □ □ Is the nozzle washer inspected before each use and replaced if worn?
- □ □ □ Is the nozzle replaced if the orifice size increases to 1/16" larger than its original size?

# **Blaster' Safety Equipment**

- □ □ Is the blaster wearing a NIOSH Type CE respirator?
- Are others personnel working in the same area wearing appropriate respiratory protection?

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Yes No N/A									
🗌 🗌 🗌 Are app	ropriate head, eye, face, and he	earing protection being use	d by all personnel?						
Is the ai	r supply at least CGA "Grade D	?"							
Is the br	reathing air filtered to remove i	moisture, oil mists, and part	ticulates?						
Sthe he	elmet inspected for wear and d	amage before each use?							
Are lens	ses replaced frequently?								
🗌 🗌 🗌 After bla	asting is the dust removed from	n the helmet and clothing b	efore they are remov	ved?					
🗌 🗌 🗌 Is the he	elmet stored in a clean, dust fre	ee location away from the b	lasting operation?						
Has the carbon monoxide monitor and alarm system been calibrated?									
Blaster									
🗌 🗌 🗌 Has the	Blaster  Has the blaster been trained qualified to the equipment, functions, blasting techniques, abrasives, maintenance requirements and safety features?								
Has the	operator participated in the pr	e-job safety meeting?							
Scaffolding									
	scaffold been inspected and sig	gned off for use?							
Sthe sc	□ □ Is the scaffolding equipment equipped with the appropriate guard rails and work platforms?								
□ □ □ Is the staging surfaces level, smooth, and free of obstructions?									
Inspection Completed	d by: Print Name	Signat	ure	Date					

Location

	14/4.60	Doc No:	AERIAL	
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AERIAL LIFTS				2
AERIAL LIFTS			Next Review Date:	02/01/2025
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The purpose of this program is to define the requirements for safely operating an aerial lift device.

#### Scope

This policy shall cover all aerial lift devices used on WACO, INC. property.

#### **Key Responsibilities**

#### Supervisors

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

#### Employees

• Shall follow all aspects of this program.

#### Procedure

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

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AMMONIA AWARE			Revision No.	2
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The purpose of this procedure is to advise employees in areas where ammonia is being used and to supply on an awareness level basis about the properties and hazards of Anhydrous Ammonia, general guidelines and training requirements.

#### Scope

This procedure applies to WACO, INC. operations where employees whose work activities may involve working with or around Anhydrous Ammonia. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers WACO, INC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

#### Responsibilities

#### Managers and Supervisors

- In coordination with the Safety Manager, develop and implement ammonia awareness training.
- Ensure personnel are aware of work that has the potential of exposure to ammonia.
- Identify possible locations where ammonia in the workplace may be used.
- Inform the Safety Manager of upcoming work involving ammonia, allowing the Safety Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the ammonia awareness requirements.

#### Safety Manager:

• Coordinate annual ammonia awareness training activities.

#### **Employees:**

- Comply with the ammonia awareness requirements and direct any questions or concerns to the Safety Manager.
- Attend required annual training.

#### Procedure

#### **Characteristics of Anhydrous Ammonia**

#### Appearance

Anhydrous Ammonia is a colorless gas under normal conditions. It can be a liquid under pressure. It has a pungent, suffocating odor. Anhydrous Ammonia is attracted to water and at ambient temperature is mainly a gas.

#### **Description**

Ammonia refers to solutions that are 50% ammonia or greater, ammonia anhydrous, and ammonia anhydrous liquefied, unless otherwise specified. Ammonia is a toxic gas or liquid that, when concentrated, is corrosive to tissues upon contact. Exposure to ammonia in sufficient quantities can be fatal. One of the highest production-volume chemicals in the U.S., concentrated ammonia is used in manufacturing, refrigeration, and agriculture (as a

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fertilizer). Household ammonia is much less concentrated; it rarely causes burns, but it does cause irritation. The lowest level at which humans can detect the odor of ammonia (odor threshold) generally provides sufficient warning of exposure; however, persons with prolonged exposure to ammonia will lose their ability to detect the odor (olfactory fatigue). Ammonia commonly exists as part of a solution.

# Health Effects of Anhydrous Ammonia

Some of the potential health effects of ammonia such as burning of the eyes, temporary blindness, coughing, chest pain, etc. 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.

Possible ways employees may be exposed to Anhydrous Ammonia during their job functions. Some examples may include, but not limited to:

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

#### Methods of Dissemination:

- Indoor Air: Ammonia can be released into indoor air as a liquid spray (aerosol) or as a vapor.
- Water: Ammonia can be used to contaminate water.
- Food: Ammonia is unlikely to contaminate food due to unpalatable qualities rendered to food.
- Outdoor Air: Ammonia can be released into outdoor air as a liquid spray (aerosol) or as a vapor.
- Agricultural: If ammonia is released into the air as a liquid spray (aerosol), it has the potential to contaminate agricultural products. If ammonia is released as a vapor, it is highly unlikely to contaminate agricultural products.

#### Routes of Exposure

Anhydrous Ammonia can cause harm if inhaled and/or if it comes into contact with the eyes or skin. High concentrations of ammonia gas, liquid ammonia and solutions of ammonia can cause harm if inhaled or if they come into contact with eyes or skin.

#### Pre-Job Planning for Ammonia Related Work

Pre-job planning or a site assessment will be conducted prior to starting work and that the assessment will documented. Documented planning will be conducted for those operations involving potential ammonia exposure and this includes anytime an active purge is being applied to a system in or around equipment associated with work. Some planning or assessment elements include:

- All proposed work requires a jobsite visit by the requestor and a unit operator to identify special precautions, equipment status and personal safety equipment requirements.
- The permit must clearly identify all hazards and special personal protective equipment requirements.
- Appropriate signage will be utilized and adhered to. Appropriate signage will include adequate warning as seen below.

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#### Personal Protective Equipment

WACO, INC. employees will use impervious clothing, gloves and/or face shields if there is a possibility of skin contact with liquid ammonia or vessels containing liquid Anhydrous Ammonia. Employees will be provided with and required to use impervious clothing, gloves, face shields and other appropriate protective clothing necessary to prevent any possibility of skin contact with liquid Anhydrous Ammonia or aqueous solutions of ammonia containing more than 10% by weight of ammonia. Similar precautions should be taken to prevent the skin from becoming frozen from contact with vessels containing liquid Anhydrous Ammonia.

#### Training

Employees will be aware of provisions of site specific contingency/emergency plans. Employees will be aware of owners' contingency plans and provisions. Employees must be informed where ammonia is used in the host facility and aware of additional plant safety rules.

WACO, INC. shall provide training for all affected employees including any WACO, INC. employee working with or near ammonia and the training shall emphasize:

- The characteristics of ammonia.
- The hazards of ammonia.
- Proper PPE.
- Owner client requirements.

Documentation of training - Ammonia awareness training shall be documented including dates of training, location of training, employee name and trainer name.

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The purpose of this procedure is to identify the controls and actions necessary to prevent adverse health effects to employees from occupational exposure to arsenic, and to ensure that Waco, Inc. arsenic exposure management practices meet regulatory requirements.

#### Scope

This procedure applies to all Waco, Inc. operations where employees may be exposed to arsenic. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Waco, Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

#### Background

Arsenic exposure in the workplace occurs through inhalation, ingestion, dermal or eye contact. Chronic exposure to arsenic can lead to dermatitis, mild pigmentation keratosis of the skin, vasospasticity, gross pigmentation with hyperkeratinisation of exposed areas, wart formation, decreased nerve conduction velocity, and lung cancer. Acute exposures can cause lung distress and death.

#### Responsibilities

#### **Managers and Supervisors**

- In coordination with the Safety Manager, develop and implement written project/task specific arsenic exposure management procedures prior to the start of activities to reduce exposure to or below the permissible limits.
- Ensure personnel are aware of work that has the potential of exposure to arsenic.
- Ensure individuals responsible for monitoring areas of exposure are properly trained.
- Ensure personnel receive documented medical surveillance if required.
- Ensure that all affected employees receive initial and annual arsenic required training.
- Ensure that training materials are readily available to all affected employees.
- Inform the Safety Manager of upcoming work involving arsenic-containing materials, allowing the Safety Manager to provide any necessary monitoring and training.
- Ensure employees have the appropriate personal protective equipment (PPE) and are properly trained in its use and care, including respiratory protection.
- Ensure employees comply with the arsenic compliance program.

#### Safety Manager shall:

- Implement a written arsenic compliance program when the PEL of 10 ug/m (3) is exceeded.
- Maintain the arsenic compliance program, notifying management of any regulatory changes and ensuring compliance with federal and state requirements.

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#### Affected Employees shall:

- Comply with the arsenic compliance program, consulting with the supervisor or Safety Manager to ensure the proper PPE is used when required.
- Comply with the medical surveillance program.
- Attend required training.
- Wear respiratory protection equipment and other specified PPE as required by the project/task specific control program.
- Maintain respiratory protection equipment in good working order, notifying the supervisor or Safety Manager of any problems prior to starting work.
- Review material safety data sheets or consult with the supervisor to identify any container with arseniccontaining material.

# Procedure

#### Written Arsenic Compliance Program

Each worksite shall develop and implement a written arsenic compliance program if arsenic poses any occupational exposure. The minimum criteria to be contained within the written program shall include:

- A description of each operation where arsenic is omitted, machinery use, material processed, controls in place, crew size, employee job responsibilities and maintenance practices.
- A description of the specific means that will be employed to meet compliance.

The arsenic compliance program must be reviewed and updated annually or more often to reflect status of the program.

The arsenic compliance program must be provided for examination and copying upon request of affected employees, their representatives or the Assistant Secretary and the Director of OSHA.

#### Exposure Monitoring

Determinations of airborne exposure levels shall be made from air samples that are representative of each employee's exposure to inorganic arsenic over an eight (8) hour period.

#### Housekeeping Plan

A written housekeeping and maintenance plan shall be kept at each worksite and shall list appropriate frequencies for carrying out housekeeping operations and for cleaning and maintaining dust collection equipment. The plan shall be available for inspection by the Assistant Secretary of OSHA

#### Signage

Adequate signs shall be in place demarcating the regulated areas. If Waco, Inc. is not the host employer, then Waco, Inc. will verify proper signs are placed at the work location.

The host employer or Waco, Inc. shall post signs demarcating regulated areas bearing the following legend:

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# DANGER INORGANIC ARSENIC CANCER HAZARD AUTHORIZED PERSONNEL ONLY NO SMOKING OR EATING RESPIRATOR REQUIRED

#### **Respiratory Protection & PPE**

Respiratory protection shall be provided in accordance with 29 CFR 1910.134 (see Waco, Inc. Respiratory Protection Program).

Respiratory protection will be used during the following circumstances required while working with arsenic:

- Periods necessary to install or implement feasible engineering or work-practice controls.
- Work operations, such as maintenance and repair activities, for which Waco, Inc. establishes that engineering and work-practice controls are not feasible.
- Work operations for which engineering and work-practice controls are not yet sufficient to reduce employee exposures to or below the permissible exposure limit.
- Emergencies.

Where the possibility of skin or eye irritation from inorganic arsenic exists, and for all workers working in regulated areas, Waco, Inc. shall provide at no cost to the employee and shall ensure that employees use appropriate and clean protective work clothing and equipment including, but not limited to, coveralls, gloves, shoes or coverlets, and face shields or vented goggles.

#### **Change Rooms & Showers**

Waco, Inc. shall provide for employees working in regulated areas or subject to the possibility of skin or eye irritation from inorganic arsenic, clean change rooms equipped with storage facilities for street clothes and separate storage facilities for protective clothing and equipment. Waco, Inc. shall assure that employees working in regulated areas or subject to the possibility of skin or eye irritation from inorganic arsenic shower at the end of the work shift.

#### Medical Surveillance

Waco, Inc. shall establish and maintain an accurate record for each employee subject to medical surveillance.

# Training

Training shall be conducted at or before initial assignment and annually thereafter for all employees who are potentially exposed to arsenic and Waco, Inc. will assure employee participation. Training materials must be readily available to all employees.

All training shall be documented.

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The purpose of this procedure is to advise Waco, Inc. non-asbestos employees in areas where asbestos is suspected on an awareness level basis about the properties and dangers of asbestos, general guidelines and training requirements and to provide basic precautions and protections for employees to avoid exposure to asbestos containing material (ACM) or presumed asbestos containing material (PACM). Waco, Inc performs asbestos abatement work with fully trained and licensed personnel. These licensed personnel must be used for any handling of asbestos containing materials.

#### Scope

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

#### **Key Responsibilities**

#### Managers/Supervisors

- Ensure owners or operators are notified of PACM.
- Prohibit Waco, Inc. employees that are not trained and licensed from working until material in question is confirmed as non-asbestos or abated.
- Ensure proper employee asbestos awareness training is completed.

#### All Employees

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

#### Awareness Level Requirements and Information

#### Asbestos Exposure Control

Depending on the exposure level Waco, Inc. is required to develop and train workers on an Asbestos Exposure Controls Plan.

#### Background of Asbestos

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

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

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

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

#### Health Effects of Asbestos

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

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

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

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

#### Types of Asbestos

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

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

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#### Identifying Asbestos

There are many substances that workers contact that may contain asbestos and have the potential to release fibers. Only rarely can asbestos in a product be determined from labeling or by consulting the manufacture. The presence of asbestos cannot be confirmed visually in many cases. The only way to positively identify asbestos is through laboratory analysis of samples. If the presence of asbestos is suspected always assume that it is an asbestos containing material and have it analyzed.

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

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

#### **General Safety Precautions**

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

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

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

#### Multiple Worksites

When working on multi-contractor worksites our employees shall be protected from exposure. If employees working adjacent to Class I asbestos jobs are exposed to asbestos due to the inadequate containment of such jobs,

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by others, Waco, Inc. shall either remove the affected employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

#### Personnel Air Monitoring

Waco, Inc. is required to perform air sampling on all abatement projects.

#### Medical Surveillance Program

All Waco, Inc. employees who are exposed to asbestos at the regulated level shall be included in the Waco, Inc. medical surveillance program.

#### **Respiratory Protection**

The only circumstances that will necessitate Waco, Inc. non-asbestos employees using respiratory equipment for protection against asbestos is during the asbestos exposure assessment process, while confirming (via personnel monitoring) that the engineering controls and work practices designed and employed for a particular non-asbestos work activity are adequate to maintain exposure levels below the PEL/excursion limit. Asbestos abatement work will be performed by asbestos trained and licensed Waco, Inc. personnel.

#### Waste Disposal

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

#### Training

This section is intended to address work other than regulated asbestos abatement work by licensed and trained personnel. Asbestos awareness training is required for employees who work in areas that contain or may contain asbestos and the training is documented.

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

Training elements are to include:

- The health effects associated with asbestos exposure;
- The relationship between smoking and exposure to asbestos producing lung cancer:
- The quantity, location, manner of use, release, and storage of asbestos and the specific nature of operations which could result in exposure to asbestos;
- The engineering controls and work practices associated with the employee's job assignment;
- The specific procedures implemented to protect employees from exposure to asbestos, such as appropriate work practices, emergency and clean-up procedures and personal protective equipment to be used.
- The purpose, proper use, and limitations of respirators and protective clothing, if appropriate;
- The purpose and a description of the medical surveillance program;
- The content of the OSHA asbestos standard, including appendices.

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• The requirements for posting signs and affixing labels and the meaning of the required legends for such signs and labels.

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

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To provide basic precautions and protections for non-asbestos trained and licensed employees to avoid exposure to asbestos containing material (ACM) or presumed asbestos containing material (PACM). Waco, Inc performs asbestos abatement work with fully trained and licensed personnel. These licensed personnel must be used for any handling of asbestos containing materials.

#### Scope

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

#### Definitions

- Asbestos an incombustible, chemical-resistant, fibrous mineral used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters.
- Asbestos containing material (ACM) any material containing more than 1% asbestos.
  - Friable Asbestos used for fireproofing, insulation, or sound proofing are considered to be friable, and they readily release airborne fibers if disturbed.
  - Non- friable Asbestos vinyl-asbestos floor tile or roofing felts are considered non-friable and generally do not emit airborne fibers unless subjected to sanding or sawing operations.
- Class I -Asbestos work Activities involving the removal of thermal system insulation (TSI) and surfacing asbestos containing material.
- Class II Asbestos work Activities involving the removal of ACM that is not TSI or surfacing material. This
  includes removal of asbestos-containing gaskets, packing, wallboard, floor tile and sheeting, roofing and
  siding shingles, and construction mastics.
- Class III Asbestos work Includes repair and maintenance operations where ACM, including TSI and surfacing material, is likely to be disturbed to the extent that renders ACM friable or generates visible debris. Class III asbestos work is limited to cutting away small amounts of ACM, no greater than the amount which can be contained in one standard sized glove bag or waste bag in order to access a building component. In no event shall the amount of disturbed ACM exceed that which can be contained in one glove bag or waste bag measuring 60 inches in length and width.
- Class IV Asbestos work Includes custodial activities during which employees are involved in clean-up activities of waste and debris containing asbestos containing material.
- Competent Person A designated Waco, Inc. employee who has the authority to take prompt corrective
  actions and has received training and certification equivalent to the EPA's Model Accreditation Plan and
  equivalent training as conducted by the National Asbestos Center, at the manager or supervisor level, and
  thereby is knowledgeable in:
  - Identifying asbestos hazards in the workplace.
  - Selecting appropriate control strategies for asbestos exposure.

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- The contents of the OSHA asbestos regulations.
- Work practices for safe asbestos removal/clean-up.
- Presumed asbestos containing material (PACM) thermal insulation and surfacing material found in buildings constructed no later than 1980.
- Surfacing material material that is sprayed, troweled-on or otherwise applied to surfaces (such as acoustical plaster on ceilings and fireproofing materials on structural members or other materials on surfaces for acoustical, fireproofing and other purposes).
- Thermal system insulation ACM applied to pipes, fittings, boilers, breeching, tanks, ducts or other structural components to prevent heat loss or gain.

#### **Key Responsibilities**

#### Managers/Supervisors

- Ensure owners or operators are notified of PACM.
- Prohibit Waco, Inc. non-asbestos trained and licensed employees from working until material in question is confirmed as non-asbestos or abated.
- Ensure proper employee training is completed.
- Ensure that all requirements of this program are understood and followed by those working under his/her direction.
- Perform duties of the Competent Person for asbestos work.

#### All Employees

All employees are required to act in strict compliance with the requirements of this program and delay or discontinue work if there is ever an unresolved concern regarding exposure to asbestos.

#### Procedure

#### **Health Effects**

Exposure to asbestos has been shown to cause lung cancer, asbestosis, mesothelioma, and cancer of the stomach and colon. Fibrotic Scaring of the lung tissue

#### General

Waco, Inc. employees that are not asbestos trained and licensed shall not work with or otherwise handle asbestos containing material.

All asbestos abatement work shall be performed by trained and license asbestos personnel.,

Client owned and/or operated equipment and facilities, where surfacing material or insulation is present, must be confirmed non-asbestos before non-asbestos, Waco, Inc. employees disturb that material.

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Where surfacing material or insulation cannot be confirmed non-asbestos, the client or owner must test, and where necessary abate, the material before non-asbestos, Waco, Inc. employees are permitted to work.

Signs shall be posted and employees will abide warning signs and labels and will not disturb the Asbestos Containing Material.

#### Approved ACM or PACM Handling

The following procedures must be followed when removing gasket or packing materials (Class II asbestos work) containing or presumed to contain asbestos:

- All employees must fulfill appropriate training, licensing, respiratory protection and medical surveillance requirements to handle ACM or PACM.
- Class II asbestos work, is limited to removal of asbestos gasket and packing materials, unless special training for other abatement work has been provided.
- Removal of gaskets and/or packing shall only be performed by employees that have been properly trained and licensed. When gaskets are visibly deteriorated, they are to be removed via wet methods and/or glove bagging.

#### Training

All employees will receive documented training prior to or at their initial assignment and at least annually thereafter who are exposed to airborne concentrations at or above the PEL. Training shall include:

- The ability to understand health effects associated with exposure to asbestos.
- Information on the relationship between smoking & exposure to asbestos producing lung cancer.
- The appropriate personal protective equipment (PPE) and its limitations (such as improper respirator fit) as described in the Waco, Inc. PPE Program and its associated training.
- The Asbestos Control Plan and any associated work practices.

A certificate of training shall be provided & maintained. Written materials relating to the employee training program will be readily available to affected employees, the assistant Secretary of Labor for Occupational Safety and Health and the director of the National Institute for Occupational Safety and Health.

#### Abatement

Asbestos personnel shall be pre-screened and approved by the group responsible for contracting the work.

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

The following documents must be obtained at least 10 working days (or as soon as possible) prior to beginning the asbestos abatement work:

- Copy of the contractor's State Asbestos License (renewed annually)
- MSDS for material used for the abatement process

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- Copy of all asbestos Notifications (if required)
- Copies of asbestos sample analysis (if performed by contractor)

The following are required upon completion of abatement work (If an asbestos project completion report is provided by the contractor, these items are often a part of it.):

- Work Summary Report, including daily work summaries.
- Results of all independent third party air sampling, including asbestos material sampling, personnel air monitoring, clearance sampling results.
- Waste Shipment Records.

Every contracted asbestos job must have assigned a competent person to monitor asbestos work and to assure compliance with all applicable regulations and requirements.

When required, an independent third party shall be contracted to perform all required air sampling for contracted asbestos removal.

Contractors who are not involved in ACM work, but who may be inadvertently exposed to ACM on Waco, Inc. property are to be informed of this potential and advised on proper methods to avoid exposure.

#### Asbestos Exposure Control

Asbestos exposure controls are designed to eliminate or minimize an employee's exposure to airborne asbestos fibers through the use of work practices and engineering controls. Where the TWA and/or excursion limit is exceeded, a written Asbestos Exposure Control Program to reduce employee exposure shall be established and implemented to reduce employee exposure to or below the TWA and to or below the excursion limit.

Prior to initiating any asbestos work the Competent Person must perform an asbestos exposure assessment. Subsequent to the exposure assessment, the engineering controls and work practices to be employed shall be identified.

Prior to commencement of work, the affected employees shall be briefed on the engineering controls and work practices designed to reduce/maintain the exposure below TWA for the asbestos work. This briefing shall be documented and maintained with the job documentation. This shall be done except to the extent that such controls are not feasible. Some of them may be exhaust systems for hand tools, wet methods, clean-up procedures and PPE shall be used.

Wet methods will be employed for all asbestos work as a means to minimize potential airborne exposure wherever possible. ACM shall be wetted from the initiation of the maintenance or renovation operation and wetting agents shall be used continually throughout the work period to ensure that any dry ACM exposed in the course of the work is wet and remains wet until final disposal.

Wetting agents, usually a surfactant (dish soap), are generally prepared by mixing 1 to 3 ounces of wetting agent to 5 gallons of water.

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# **Regulated Areas**

Regulated asbestos areas shall be established with barriers, tape, OSHA approved warning signs and other physical controls when airborne concentrations of asbestos are present.

The limit shall comply with that of the TWA and/or excursion limit. Access is limited to regulated areas.

All employees who perform work in regulated areas shall be covered by this procedure. Employees who perform housekeeping activities during and after construction activities are also covered by this procedure.

If employees working immediately adjacent to asbestos jobs by other contractors are exposed to asbestos due to the inadequate containment of such job, Waco, Inc. shall either remove the employees from the area until the enclosure breach is repaired; or perform an initial exposure assessment pursuant to 1926.1101(f).

# **Personnel Air Monitoring**

Monitoring shall occur to ensure that no employee is exposed to an airborne concentration of asbestos in excess of 1.0 fiber per cubic centimeter of air (1 f/cc) in 30 minutes.

When required, an independent/third party air sampling person shall perform all required air sampling during contractor asbestos work and provide the results to the Waco, Inc. Competent Person.

The air quality is to be determined from breathing zone air samples. The samples shall be representative of the 8-hour TWA and 30-minute short-term exposure. Measurements are required for documentation.

Affected employees and/or their designated representatives are to be provided the opportunity to observe asbestos exposure monitoring.

Air sampling analysis shall be performed by an American Industrial Hygiene Association (AIHA) accredited laboratory.

Where the asbestos exposure assessment does not present objective, convincing data that indicates the ACM to be handled will not release airborne fibers, personnel air monitoring shall be performed to quantify exposure.

If personnel monitoring is considered necessary during the asbestos exposure assessment, in an effort to verify exposures would be maintained below the PEL/excursion limit, respiratory protection shall be utilized until such time that sufficient sampling results verify that respiratory protection is not required.

The Waco, Inc. Safety Manager is to be consulted for advice and assistance in performing personnel air sampling activities.

The number of samples necessary to be considered "representative" is dependent upon many factors and must be determined in consultation with the Waco, Inc. Safety Manager, certified Industrial Hygienist consultant, or a third party air sampling professional.

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Affected employees shall be notified of monitoring results, which represent the employee's exposure, as soon as possible following receipt of the monitoring results.

Employees shall be notified in writing either individually or by posting at a centrally located place that is accessible to affected employees.

On non-abatement projects, once representative sampling indicates that exposure levels for that particular activity are consistently below the OSHA established permissible limit and/or excursion limit, the requirement for respiratory protection may be waived.

It is imperative that accurate personnel air sampling records are maintained in order to justify any relaxation of respiratory protection requirements.

Results of air sampling data must be maintained in the asbestos job documentation.

#### Medical Surveillance Program

All Waco, Inc. abatement and non-abatement employees who are exposed at or above the permissible exposure limit for a combined 30 days or more per year shall be included in the Waco, Inc. medical surveillance program.

Note: For purposes of this requirement, any day in which an employee is engaged in abatement work shall be counted. The medical surveillance program shall be made available according to the following schedules:

- Prior to assignment of an employee to an asbestos area or where negative pressure respirators are worn.
- Where exposure to asbestos may be at or above the permissible exposure level, at least annually thereafter, as long as exposures exist.
- Asbestos medical examination must be given prior to exposure.
- If an examining physician determines that any of the examinations should be provided more frequently than specified, they shall be provided at the periodicity specified by the physician.

No asbestos medical examination is required when complete records of such examination, performed less than twelve months prior to commencement of asbestos work are available.

As part of the medical surveillance, the attending physician shall provide a written opinion of the results of the medical examination to Waco, Inc. and the Contract Medical Surveillance Provider, who in turn will provide a copy to the affected employee within 30 days.

In accordance with OSHA regulations, once employees are no longer exposed to asbestos their inclusion in the medical surveillance program is no longer required.

#### **Respiratory Protection and Personal Protective Equipment**

The use of approved respirators shall be at no cost to the employee and will be used in conjunction with work practice controls, work operations, to reduce exposure and in emergencies.

	\A/	la -	Doc No:	ASBMGNT
Waco, Inc. Safety Management System		Initial Issue Date	01/06/2012	
Inc			Revision Date:	02/01/2024
	Revision No.	3		
ASBESTOS MANAGEMENT / MAINTENANCE WORK			Next Review Date:	02/01/2025
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The respirator shall be provided at no cost to the employees and shall be chosen in accordance with the Waco, Inc. Respiratory Protection Program and shall be approved by NIOSH. Powered, air-purifying respirators shall be available when the employees choose to use this type or the hazard assessment process requires this type, or when the respirator will provide more adequate protection. Prerequisites for use of respiratory equipment, regarding asbestos, include:

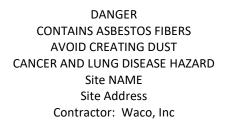
- Successfully passing a respiratory physical.
- Successfully completing annual respiratory protection training.
- Successfully passing a respirator fit test.

When working above the TWA PPE shall include, but not be limited to protective coveralls, gloves, head coverings and foot coverings, vented goggles, face shields and others based on the hazard.

# Waste Disposal

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

Bags or containers shall be imprinted and clearly labeled with the following OSHA asbestos hazard warning and address:



Bags/containers shall be clearly labeled, for DOT, as: RQ, Asbestos, 9, NA2212, PG III

Containers shall have a DOT number 9 diamond label on the container if the shipping container is greater than 66 pounds. For assistance with DOT labeling requirements, contact the Waco, Inc. Safety Manager.

An Asbestos Waste Shipment Record shall be utilized. Check with the landfill prior to shipping to see if they require their own shipping record or use a Waste Manifest – contact the Safety Director for copies.

Asbestos shall be transported to an approved landfill that accepts asbestos. A licensed waste hauler may be used to transport the packaged ACM. Transport vehicles shall either be enclosed or covered. Do not use vehicles with compactors to transport ACM.

A shipping form shall accompany the ACM, during transport, to the landfill.

# Record Keeping

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All records relating to any asbestos activity shall be maintained by Waco, Inc. permanently.

The following records shall be maintained:

- Exposure Assessments that are being relied upon to support a location's position that asbestos work (specific or generic) will not result in exposures above the PEL or excursion limit.
- Employee asbestos exposure records (personnel air monitoring).
- Medical Surveillance records.
- Training records.
- Shipping papers and disposal records.
- Copies of notification letters sent to Governmental agencies.
- Pre-project asbestos sampling results.
- Post-project clearance sampling results.
- Daily Work Summaries.
- Project Completion Closure Report, if provided.

			Doc No:	GFCI
(Imp)	Waco, Inc. Safety Management System	Initial Issue Date	01/06/2012	
Inc			Revision Date:	02/01/2024
ASSURED EQUIPMENT GROUNDING CONDUCTOR PROGRAM			Revision No.	2
or GROUND FAULT C	Next Review Date:	02/01/2025		
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The purpose of this program is to provide procedures and guidelines to eliminate all injuries resulting from possible malfunctions, improper grounding and/or defective electrical tools. This program applies to all sites, employees and contractors and shall be used on owned premises.

#### Definitions

Competent Person - one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

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

#### Responsibilities

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

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

#### **Procedures and Guidelines to Eliminate Injuries**

The following procedures and guidelines are designed to eliminate all injuries resulting from possible malfunctions, improper ground and/or defective tools.

#### Assured Grounding Site Program Requirement

An assured grounding conductor program must be implemented on all Waco, Inc. sites covering all cord sets, receptacles which are not part of the building or structure & equipment connected by cord and plug which are available for use or used by employees.

#### **Ground Fault Circuit Interrupters**

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

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

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• The GFCI must be tested before each use.

#### Assured Equipment Grounding Conductor Program

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

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

#### **Removing Equipment**

Restrictions for the use of equipment that does not meet requirements or if is found to be defective shall be applied and enforced. Any equipment which has not met the requirements of this program shall not be available or permitted to be used by Waco, Inc.. Damaged items shall not be used until repaired.

#### How Often Inspection of Cords and Equipment are to be Made

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

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

#### How and When Tests are Performed and What Records are Maintained

All equipment grounding conductors shall be tested for continuity and shall be electrically continuous.

Each receptacle and attachment cap or plug shall be tested for correct attachment of the equipment grounding conductors. The equipment grounding conductor shall be connected to its proper terminal.

When tests are performed:

- Before each use.
- Before equipment is returned to service following any repairs.
- Before equipment is used such as when a cord has been run over.
- At intervals not to exceed 3 months, except that cord sets and receptacles which are fixed and not exposed to damage shall be tested at intervals not exceeding 6 months.

Tests performed as required by this program shall be recorded as to the identity of each receptacle, cord set and cord and plug connected equipment that passed the test and shall indicate the last date tested or interval for which is was tested. This record shall be kept by means of logs, color coding or other effective means and shall be maintained until replaced by a more current record. These records shall be made available at the job site for inspection by the Assistant Secretary and any affected employees.

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

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

			Doc No:	BBS
	,	WACO, INC.		10/15/2017
Inc	Safety Management System		Revision Date:	02/01/2024
BEHAVIOR BASED SAFETY			Revision No.	2
			Next Review Date:	02/01/2025
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The WACO, INC. Behavior Based Safety (BBS) initiative is an education and observation process used to improve safety and reduce risk in the workplace. This process uses a proactive approach and is intended to communicate to employees the elements and the procedures of Behavior Based Safety that will assist in reducing at risk behaviors which in turn reduces injuries in our workplaces.

#### Scope

The WACO, INC. BBS applies to all staff. Employees are permitted to participate in BBS initiatives already in place at customer locations if required by the customer. Employees are requested to participate in Behavior Based Safety process and follow the process guidelines.

#### Requirements

Safety awareness principles are the foundation of the WACO, INC. Behavior Based Safety process. The key concepts teach employees to recognize when they may be in one of the following states:

- Rushing
- Frustration
- Fatigue
- Complacency (which can cause or contribute to these critical errors)
- Eyes not on task
- Mind not on task
- Line of fire
- Loss of balance/traction/grip (which in turn increase the risk of injury.)

Pre-task Analysis is a process to evaluate the work environment by performing a Job Safety Analysis (JSA) of each job. The purpose of which is to eliminate or control all hazards that may be encountered to complete the job. This process is included in the Behavior Based Safety process to establish the correct habits and work procedures in order to reduce at-risk behaviors.

The observation process is designed to raise safety awareness and provide a feedback mechanism for management to make changes in design, process or procedure in order to reduce at-risk behaviors. The key to this process is raising awareness of behavior through observation and feedback. The process has three key elements:

#### **Conducting Observations of Employees Work Behavior**

Observations provide direct, measurable information on employee work practices identifying both safe and unsafe behaviors. The process starts with the observation of workers - fellow employees, other contractor employees and customer employees as they perform their tasks. Observers collect information about worker performance and provide feedback via the observation card. The emphasis is not on who was observed but rather what behavior was observed.

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During the observation the observer records their findings on the BBS Observation Form. Items to be observed include but are not limited to:

- Personal Protective Equipment
- Procedures / Methods
- People
- Work Environment
- Equipment

Upon completion of an observation the observer is expected to have a discussion with the observed to get feedback. The observer will:

- Review the observation with observed employee.
- Start with a positive comment.
- Reinforce safe behaviors observed first.
- Describe and discuss unsafe behaviors observed.
- Solicit from observed employee explanation of his/her unsafe behavior with open-ended questions.
- Re-emphasize no consequence to observed employee.

Documenting feedback allows workers to assess what should be repeated and what should change to reduce risks in the workplace.

## **Collection of Data and Performing Trend Analysis**

Individual departments, as well as WACO, INC. as a whole, will compare these measurements and track these results by an acceptable method so that numerical and statistical comparisons can be made over time.

BBS Observation Forms are forwarded to the corporate safety manager for input into the BBS database. Reports are generated and forwarded to management. WACO, INC. will collect data and performing trend analysis based on the information.

## Elements of an Action Plan After the Trend Analysis is Completed

Once trend analysis is complete, appropriate action plans shall be developed to address unsafe behaviors. Action planning will include:

- Evaluate unsafe behaviors from trend analysis and prioritize
- Develop action plan for unsafe behaviors based on comments and feedback from data sheets
- Designate responsible parties and timeframes within the action plan
- Define who is responsible for action planning
- Ensure management support

### Action Plan Follow Up

All action plans shall be arranged by a set time period. To ensure effectiveness of the BBS follow-up is necessary to ensure the closure of all actions listed. The follow-up process will include:

- Monthly frequency for review of action by the safety manager, senior management and employees.
- Assign accountability for closeout of action plans within WACO, INC.

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• Document archiving of action plans with completed action items.

# Responsibilities

## Oversight

The manager/supervisor has these oversight responsibilities:

- Coach observers and develop action plans to ensure continuous improvement.
- Ensure that all employees are trained on the Behavior Based Safety elements.
- Maintain communication with workforce by channeling information in a timely manner (feedback).
- Collect and review process modification change requests from employees.
- After reviewing and giving feedback the BBS/JSA cards should be forwarded to the corporate safety director for data entry.

Each employee plays a specific role in the Behavioral Based Safety process. These roles include observee, observer, supervisor, manager and safety manager.

### Person being observed

- Be willing to be observed.
- Be open and cooperative.
- Avoid being defensive.
- Participate in problem-solving meetings.
- Be familiar with the Behavior Based Safety process.

### Person performing the observation

- Learn the Behavior Based Safety process and the benefits of reducing at-risk behaviors.
- Promote the Behavior Based Safety process.
- Make observing proactive.
- Be open to coaching.
- Be courteous and helpful.
- Assist workers by offering suggestions to safely perform a task or help them with a task if necessary.
- Communicate with the workers being observed.
- Give constructive feedback after observations.
- Stress the safe behaviors before the at-risk behaviors.
- Offer and work towards solutions of problems found.
- Record a comment for every recorded "at-risk" to include what and why. Make quality observations, concentrating on quality comments.

### Manager

- Actively promote and participate in the behavior safety process by supporting the goals and objectives of the Behavior Based Safety process.
- Ensure that all employees are aware of what is expected of them regarding the BBS process.
- Encourage employees to participate in observations so that incidents/injuries are reduced in the workplace.

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- Provide necessary resources to keep process productive.
- Attend safety meetings and offer feedback on areas of improvement.

## Supervisor

- Actively promoting and participating in the Behavior Based Safety process by reviewing BBS Observation Forms turned in at least weekly and giving feedback, completing corrective actions needed, etc.
- Refraining from using data from the Behavior Based Safety process in a punitive manner.
- Assisting in problem solving and completing corrective actions in a timely manner.
- Understanding the behavior safety process and the benefits of reducing at-risk behaviors.

## Safety Manager

- Support the goals and objectives of the Behavior Based Safety process.
- Encourage, promote, provide technical support and assist in acquiring the resources needed for the Behavior Based Safety process.
- Address the concerns and suggestions of field personnel.
- Collect all observation data cards.
- Enter data into BBS database.

## Training

Training on the observation process will include how to conduct the observation, how to complete the observation form, what do the behaviors mean, feedback training and role play (mentoring and coaching) and employees should be aware they may be observed at any time.

Training will include:

- Program objectives and incident metrics reviewed.
- How to conduct the observation.
- How to complete the observation form.
- What do the behaviors mean.
- Feedback training and role play (mentoring and coaching).
- Employees should be aware they may be observed at any time.

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# **BBS Safety Observation Form**

sub	Your concerns for safety and suggestions as how to improve our safety program are important to WACO, INC Use this form to submit either safety improvement input and/or a BBS safety observation. Your name is optional and the name of the person being observed is not to be used. This information will be used to continually improve our safety system and conditions. Improvement Input										
[	] BBS	5 Observation	🗆 Un:	safe					on		Environmental
Em	oloyee	e/Observer Input :									
Em	oloyee	e's Action Taken or Re	commer	datio	on:						
Sup	erviso	or or Management Act	ion Take	en:							
Safety Observation S=Safe C=Concern Critical Factors											
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Р	PE / P	rocedures / Methods			osition / Mechanics	C=Co		Slips / Trips		•	uipment / Work Environment
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S S	C C	Eye & Head Hand & Body	Bo S S	dy P	osition / Mechanics Proper Position Ask for Help	s s	C C	Slips / Trips Proper Footwear Aware of Hazards	S	c c	Environment MSDS If Needed Lock Out
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Waco, Inc. Safety Management System		Doc No:	BENZENE	
		Initial Issue Date	01/06/2012	
Inc			Revision Date:	02/01/2024
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# Purpose

The purpose of this program is to define work practices, administrative procedures and engineering controls to protect employees exposed to benzene concentrations above the OSHA action level. This plan shall be implemented and kept current by the Safety Manager as required to reflect the most recent exposure monitoring data.

## Scope

This program covers all employees who may be exposed to benzene in the course of completing job duties. This written plan shall be made available to the Assistant Secretary, the Director, affected employees and designated employee representatives. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Waco, Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent. Employees will be aware of provisions of site specific contingency/emergency plans by either Waco, Inc. or of a facility owner.

The Waco, Inc. Safety Manager will develop and implement project/task specific benzene control procedures prior to the start of activities that may include exposure to benzene. Waco, Inc. will be aware of an owner's contingency plan provisions and all employees must be informed where benzene is used in host facility and aware of additional plant safety rules.

Possible locations where employees may be exposed to benzene during their job functions may include, but not limited to: petroleum refining sites, tank gauging (tanks at producing, pipeline & refining operations) and field maintenance operations.

## Definitions

- Action Level means an airborne concentration of benzene of 0.5 ppm calculated as an 8-hour timeweighted average.
- Benzene a toxic, colorless liquid or gaseous material. Benzene has an aromatic odor, is not soluble in water and is flammable.
- Employee exposure exposure to airborne benzene that would occur if the employee were not using respiratory protective equipment.
- Health Effects Short-term overexposure may cause irritation of eyes, nose and skin; breathlessness, irritability, euphoria, headache, dizziness or nausea. Long term effects may result in blood disorders such as leukemia and anemia.

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# **Key Responsibilities**

### Manager or Designee

- Ensure personnel are aware of work that has the potential of exposure to benzene.
- Ensure individuals responsible for monitoring areas of exposure are properly trained.
- Ensure personnel receive documented medical surveillance exams.
- Ensure that emergency exams are performed if an overexposure or suspected overexposure occurs.

### Supervisors

- Ensure employees have the appropriate personal protective equipment (PPE) and are properly trained in its use and care.
- Ensure employees comply with the benzene control program.

#### Safety Manager

- In coordination with the Manager, develop and implement project/task specific benzene control procedures prior to the start of activities that may include exposure to benzene.
- Coordinate monitoring activities, ensuring monitoring equipment is in proper working order and, as necessary, modifying the benzene control procedures to reflect exposure monitoring data.
- Maintain the benzene control program, notify management of any regulatory changes and ensure compliance with regulatory, client and corporate requirements.
- Coordinate training activities.
- Coordinate the medical surveillance program, including maintenance of medical records and administration of exams.
- Ensure fire extinguishers shall always be readily available where benzene is used/stored. Benzene liquid is highly flammable and vapors may form explosive mixtures in air. Fire extinguishers must be readily available in areas where benzene is used or stored.

### Employees

- Comply with the benzene control program.
- Know where benzene is used at Waco, Inc. or client facilities and follow any of additional plant safety rules required by the client.
- Comply with the medical surveillance program and attend examinations as required.
- Maintain respiratory protection equipment in good working order and notify the supervisor or Safety Representative of any problems prior to starting work
- Review material safety data sheets or consult with the supervisor to identify any container with benzene containing material.
- Not smoke in prohibited areas where benzene is present.
- Report exposures resulting in any symptoms immediately.

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# Procedure

## Permissible Exposure Limits

The time-weighted average limit (TWA) for benzene is:

- 8-hour TWA 1 ppm
- 12-hour TWA 0.67 ppm

The short-term exposure limit (STEL) for benzene is 5 ppm.

### **Regulated Areas**

- Waco, Inc. shall establish regulated areas wherever airborne concentration of benzene exceeds or can reasonably be expected to exceed the PEL or STEL.
- Waco, Inc. will control access to regulated areas and limit access to authorized personnel.
- Safety precautions such as prohibition of smoking in areas where benzene is used/stored shall be taken. Smoking is prohibited in areas where benzene is used or stored. The following signage shall be posted in all regulated areas when the potential exists for benzene vapors to be in excess of the PEL:

## DANGER – BENZENE REGULATED AREA CANCER CAUSING AGENT FLAMMABLE – NO SMOKING AUTHORIZED PERSONNEL ONLY RESPRIATOR REQUIRED

## Methods of Compliance

- The benzene control program shall be written and implemented to comply with OSHA regulation 29 CFR 1910.1028 (Benzene).
- Waco, Inc. shall establish and implement a written program to reduce employee exposure to or below the PEL primarily by means of engineering and work practice controls to ensure compliance with the benzene control program and federal and state requirements.

### **Exposure Monitoring**

Exposure monitoring shall be performed for the 8-hour and 12-hour TWAs or for the 15 minute STEL exposure when:

- Regulated areas are established
- An emergency occurs that could require a regulated area
- A change in the production, process, control equipment, personnel or work practices may result in new or additional exposure to benzene
- Cleanup of a spill, leak repair, or rupture occurs
- If the monitoring required reveals employee exposure at or above the action level but at or below the TWA, Waco, Inc. shall repeat the monitoring for each employee at least every year.
- If the initial monitoring reveals employee exposure to be below the action level Waco, Inc. may discontinue the monitoring.

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- If the monitoring reveals that employee exposures, as indicated by at least two consecutive measurements taken at least 7 days apart, are below the action level Waco, Inc. may discontinue to monitor.
- Direct reading detection instruments (Drager CMS is recommended) will be used where benzene vapors may be present in work areas not previously monitored.
- Personal monitoring will be performed by use of vapor monitoring badges following manufacturer requirements. All samples shall be analyzed at an AIHA (American Industrial Hygiene Association) certified laboratory.

## Medical Surveillance

- Baseline and annual medical exams shall be provided to employees that may work or are anticipated to participate in operations more than 10 times per year or may work in areas where benzene exposures may exceed the PEL over 30 days per year.
- Waco, Inc. shall make available a medical surveillance program for employees who are or may be exposed to benzene at or above the action level 30 or more days per year; for employees who are or may be exposed to benzene at or above the PELs 10 or more days per year; for employees who have been exposed to more than 10 ppm of benzene for 30 or more days in a year prior to the effective date of the standard when employed by their current employer.
- Notification of monitoring results shall be provided to employees in writing within 15 working days of receipt of results.

### Personal Protective Equipment

- PPE will be selected on the basis of its ability to prevent absorption, inhalation and ingestion.
- PPE will reflect the needs of the employee based on work conditions, amount and duration of exposure and other known environmental factors but shall contain as a minimum; boots, proper eye protection, gloves, sleeves, aprons and others as determined.
- PPE shall be provided and worn when appropriate to prevent eye contact and limit dermal exposure to liquid benzene. PPE must meet the requirements of 29 CFR 1910.133 and provided at no cost to the employees.

### **Respiratory Protection**

- A respiratory protection program shall be established in accordance with 29 CFR 1910.134. Respiratory protection is required:
  - o During the time period necessary to implement engineering controls or work practices.
  - When engineering and work practices are not feasible.
  - o In emergencies.

Approved respirators shall be selected according to airborne concentrations of benzene or condition of use.

- 0 to 0.67 ppm no respirator required
- 0.67 to 6.7 ppm half-mask respirator with OV cartridges
- 6.7 to 33 ppm full-face respirator with OV cartridges

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• Greater than 33 ppm – Due to the Waco, Inc. policy of not permitting SCBA no employee shall enter a space containing more than 33 ppm.

## Recordkeeping

- Medical surveillance records shall be maintained for 30 years after termination of employment
- Exposure monitoring records shall be maintained for 30 years after completion of the project
- Exposure and medical monitoring records shall be made available to affected employees or their representatives and to OSHA upon request

## **Communication of Benzene Hazards**

- Signs and labels shall be posted at entrances of regulated areas
- The benzene control program shall be updated by the Waco, Inc. Safety Manager
- Project site specific contingency and emergency procedures shall be updated by the Safety Manager and made available to project staff prior to beginning work at the specific site.

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# Purpose

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

## Scope

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

## **Key Responsibilities**

## Exposure Control Officer (WACO, INC. Safety Manager)

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

### Site Project Manager and Supervisors

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

### Employees

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

### Procedure

### Training

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

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



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## Availability of Procedure to Employees

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

## **Reviews and Update of the Procedure**

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

### **Exposure Determination**

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

## **Methods of Compliance**

### Universal Precautions

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

### **Engineering Controls**

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

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

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

### Work Practice Controls

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

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

## Personal Protective Equipment

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

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

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

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• WACO, INC. will repair and replace PPE as needed to maintain its effectiveness.

# Housekeeping

Our staff employs the following practices:

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

## Post-Exposure and Follow Up

### Post-Exposure Evaluation & Follow-Up

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

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

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

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

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

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

### Healthcare Professional's Written Opinion

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

- Whether Hepatitis B Vaccination is indicated for the employee.
- Whether the employee has received the Hepatitis B Vaccination.

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

### Record Keeping

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

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

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

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

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

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

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

### Labels and Signs

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

### Information

Information provided to our employees includes:

- The Biohazards Standard itself.
- The epidemiology and symptoms of bloodborne diseases.
- The modes of transmission of bloodborne pathogens.
- Our facility's Exposure Control Procedure (and where employees can obtain a copy).

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- Appropriate methods for recognizing tasks and other activities that may involve exposure.
- A review of the use and limitations of methods that will prevent or reduce exposure.
- Selection and use of personal protective equipment.
- Visual warnings of biohazards within our facility including labels, signs and "color-coded" containers.
- Information on the Hepatitis B Vaccine.
- Actions to take and persons to contact in an emergency involving potentially infectious material.
- The procedure to follow if an exposure incident occurs, including incident reporting.
- Information on the post-exposure evaluation and follow-up, including medical consultation.

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## VACCINATION DECLINATION FORM

Date:\_\_\_\_\_

Employee Name: \_\_\_\_\_

Employee ID#:

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

Employee Signature

Facility Representative Signature

Date

Date

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# POST-EXPOSURE EVALUATION AND FOLLOW-UP CHECKLIST

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

## <u>ACTIVITY</u>

# COMPLETION DATE

Employee furnished with documentation regarding exposure incident.

Source individual identified.

(\_\_\_\_\_) Source individual

Appointment arranged for employee with healthcare professional.

(\_\_\_\_\_) Professional's name

Documentation forwarded to healthcare professional

Bloodborne Pathogens Standard

\_\_\_\_\_

Description of exposed employee's duties

Description of exposure incident, including routes of exposure

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## Purpose:

The purpose of this program is to establish requirements for the use and handling of materials that expose employees to cadmium and/or hexavalent chromium.

### Scope

This program covers all employees.

## **Key Responsibilities**

#### Managers/Supervisors

- Shall ensure that all employees are aware of the proper work procedures for cadmium and hexavalent chromium
- Shall ensure that initial training is conducted for all new employees and that retraining is conducted when employee behaviors suggest that retraining is warranted.
- As part of the JSA and other hazard evaluation processes, identifies and evaluates chromium or cadmium hazards and potential exposures during planning and the conduct of work.
- Reviews and approves the Task-Specific Safety Analysis.
- As necessary, quantitatively determines the presence of chromium or cadmium in materials, substrates, and other media. This may involve the collection of samples for analysis by a qualified laboratory or field testing using acceptable test methods.
- Provides results of any chromium or cadmium survey to management/supervision, along with information
  regarding hazard potential and control measures. As appropriate, makes recommendations to
  management/supervision to maintain, modify, upgrade, or downgrade controls accordingly.
- Takes prompt corrective measures (or supports any Competent Person in this role) to eliminate hazards; such as recommending to management/supervision to implement or modify engineering, administrative, work practice, and personal protection (including respiratory protection) controls.
- Conducts periodic exposure assessment.
- As appropriate, assists management/supervision in ensuring that workers have the necessary training and medical surveillance based upon the activity and hazard.
- Ensures that medical monitoring is conducted in accordance with 29 CFR 1926.1126 (for chromium) or 29 CFR 1926.1127 (for cadmium) including imposition of work restrictions where appropriate and reviewing results of medical monitoring.
- In evaluating chromium or cadmium hazards and specifying controls for a job, (a) utilizes reliable historical
  exposure monitoring data generated for other similar operations or activities, (b) utilizes objective data,
  and/or (c) plans and conducts initial monitoring to determine exposures and assess the effectiveness of
  hazard controls.
- Conducts initial and periodic exposure monitoring in accordance with National Institute for Occupational Safety and Health (NIOSH)/OSHA methods if lacking historical or objective data.
- Maintains effective records of jobs monitored, so that a historical database can be used to specify controls and eliminate unnecessary and redundant monitoring for future activities.
- Supports project management/supervision in responding to exposures above the PEL when workers were not adequately protected.

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• As appropriate, participates in pre-job and daily worker briefings regarding task-specific chromium or cadmium hazards and controls, work practices/plans (such as JSAs), and other applicable information, including any changes that are made to controls or to the work practices or plans.

## Employees

• Shall follow all requirements regarding the safe work procedures for cadmium and hexavalent chromium.

## **Cadmium Procedure**

### **Compliance Program**

A written compliance program shall be implemented when the PEL for cadmium is exceeded at a work site.

The following areas shall be addressed within the site compliance program and to ensure emergency plans are in place should a release of cadmium occur:

- Potential exposure determination including a description of each operation where cadmium is omitted, machinery use, material processed, controls in place, crew size, employee job responsibilities and maintenance practices.
- Air monitoring data or developing a justification for not conducting monitoring based on previous monitoring/historical data or objective data.
- Engineering controls including the specific means that will be employed to meet compliance.
- A report of technology considered in meeting the PEL.
- A detailed schedule of implementation.
- Consideration of respiratory protection.
- A documented, written plan for dealing with emergency situations involving a substantial release of cadmium.
- Work practice program.
- Other relevant information such as protective clothing, housekeeping, hygiene areas and practices (including consideration of shower facilities), consideration of medical surveillance, training and recordkeeping.

The written program must be reviewed and updated annually or more often to reflect significant changes in the compliance status for Waco, Inc..

The program shall be provided for examination and copying upon request of affected employees, their representatives or OSHA officials.

Maintenance procedures while working on ventilation systems and changing of filters will be established. Procedures shall be developed and implemented to minimize employee exposure to cadmium when maintenance of ventilation systems and changing of filters. Examples include: Proper use of PPE, use of HEPA filtered vacuums, wet sweeping or other methods to minimize the likelihood of exposure to chromium. No compressed air shall be used to remove chromium from any surface. Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

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Construction work activities that result in exposure to chromium or cadmium may include, but are not limited to, the following:

- Demolition or salvage of structures where chromium or cadmium, or materials containing chromium or cadmium, are present.
- Removal or encapsulation of materials containing chromium or cadmium.
- New construction, alteration, repair, or renovation of structures and substrates that contain chromium or cadmium.
- Installation of products containing chromium or cadmium.
- Working with/around Portland cement (in powder or dust form chromium only).
- Torch-cutting chromium/cadmium containing paints.
- Transportation, disposal, storage, or containment of chromium or cadmium, or materials containing chromium or cadmium.
- Maintenance operations associated with construction activities.
- Welding, cutting, burning, or grinding stainless steel, chromium-/cadmium-containing alloy steel, and chromium/cadmium containing alloys.

Note!!! Exposure to chromium (especially hexavalent chromium) has also occurred when the welding rod or wire in use contains chromium.

The permissible exposure limit (PEL) for cadmium and hexavalent chromium is five (5) micrograms calculated as an 8-hour time-weighted average over a work shift. The action level (AL) of 2.5 micrograms triggers the following requirements:

- Pre-job planning includes, as needed, a thorough identification of chromium or cadmium materials. Identification may include the product name, a Material Safety Data Sheet (MSDS) with the MSDS number (if available) or a sample content analysis. Sampling data includes location, sampling method, sampling dates, laboratory identification, and analytical method.
- If documentation is not feasible or has been determined by the project engineer to be unavailable or unreliable, chromium or cadmium content sufficient to exceed the action level for chromium or cadmium is assumed.

Results of bulk sampling, calculations of potential chromium or cadmium exposure, and other data that demonstrate compliance with this practice (as well as the pertinent standards) are attached to the work package.

Where chromium or cadmium exposure above the action level is suspected, and in the absence of monitoring data, interim protective measures are established that are equal to or greater than the assumed exposure level.

## **Hexavalent Chromium Procedure**

### Welding, Cutting, and Grinding

Certain welding and cutting activities have been shown to expose the welder/cutter, and potentially helpers, to hexavalent chromium above the action level when exhaust ventilation is not used. The activities have included the following:

• Shielded metal arc welding, Gas metal arc welding

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- Flux cored arc welding, Sub arc welding
- Torch cutting through chromate-containing paints, grinding chromium-containing metals.

The types of metal involved have been stainless steel, chromium-containing alloy steel, and chromium-containing nonferrous alloys. Exposure has also occurred when the welding rod or wire in use contains chromium, and exhaust ventilation is not used.

Therefore, exhaust ventilation is always prescribed as a control measure when activities with the materials mentioned above are in use unless historical personal monitoring data performed when similar materials, using similar methods, under similar environmental conditions are used shows conclusively that the welder/cutter and helper (if applicable) are not exposed above the action level without regard to respiratory protection.

Practices and procedures shall ensure that no employee is exposed to hexavalent chromium in excess of the permissible exposure level which is 5 micrograms per cubic meter of air based on an 8 hour Time Weighted Average.

## Plasma and Air Arc Cutting and Gouging

Plasma and air arc cutting and gouging operations have been shown to expose the worker and helpers within 10 feet of the work to levels of hexavalent chromium above the permissible exposure limit (PEL) under most circumstances and conditions. Exhaust ventilation and respiratory protection (at least a half-face, tight-fitting respirator with a HEPA filter/cartridge) are always prescribed as control measures when activities with the materials mentioned above are in use; a higher level of respiratory protection may be prescribed, depending on conditions.

Note!!! Each discrete task must begin with ventilation and respiratory protection control measures in place. Respiratory protection may be downgraded only upon conclusive results of breathing zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than 50 percent of the protection factor of the respirator relative to the concentration and PEL of hexavalent chromium. Respiratory protection may be eliminated only upon conclusive results of breathing-zone monitoring of the employee(s) involved in each discrete task showing exposure to be less than the PEL as an 8-hour time-weighted average.

Additional controls may also be appropriate to be in compliance with 29 CFR 1926.1126, depending on the results of evaluations of the materials to be used, environmental conditions, length of the work process/activity, etc. Employees who are exposed at or above the action level 30 days or more per year are enrolled in a medical surveillance program.

Personal hygiene is very important while working with chromium or cadmium products. To avoid accidental ingestion of chromium or cadmium, employees wash thoroughly (regardless of other controls) prior to eating, chewing, smoking, or drinking.

## Practices

Waco, Inc. Management/supervision supported by safety professional(s), the medical contractor and training providers conducts the following basic steps to control exposure to chromium or cadmium:

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- Determine the types of projects, activities, and operations that could involve chromium or cadmium, or chromium or cadmium-containing materials. For those jobs, conduct hazard identification as part of the work design, planning, and control process.
- If chromium or cadmium materials are involved, ensure that project safety (for chromium) or a competent person (for cadmium) conducts a hazard evaluation to determine the potential exposure and to recommend initial controls.
- Develop and implement a Task-Specific Safety when exposure is or is likely to be above the PEL. The JSA (or equal) addresses the scope of work activities; provides initial exposure assessment; and prescribes exposure controls, air-monitoring requirements, work practices, personal protective equipment and additional information as required.
- Incorporate recommendations from project safety for chromium or cadmium hazard control measures into any JSA and work control documents.

## **Exposure Monitoring**

Monitoring or measuring of employee exposure shall be conducted at least every 6 months if the initial monitoring shows employee exposure. Air monitoring will be performed at the beginning of each job task. If exposure monitoring results indicate exposure is above the PEL Waco, Inc. must include in the written notification to employees the corrective action being taken to reduce exposure to or below the PEL.

- Notify each affected employee, in writing, of the results of monitoring within five (5) working days.
- Air monitoring for chromium or cadmium may be waived provided the following conditions are met:
  - Monitoring has been performed in the last 12 months.
  - Data from historical monitoring originates from work operations that closely resemble the planned work operations.
  - Workplace and environmental conditions (such as indoors or outdoors, temperature, wind speed, ventilation, and space configuration) are similar to those when the monitoring was performed.
  - The processes, types of material, control methods and work practices are similar.
  - Justification for waving initial monitoring shall be included in the Task-Specific Safety Analysis or equal. Employees involved are briefed regarding the existence of such data.

### Surveillance

Medical surveillance shall be provided when an employee experiences signs or symptoms of the adverse health effects of Hexavalent Chromium (dermatitis, asthma, bronchitis, etc.). Medical evaluations will be provided at no cost to employees. Examinations will be performed by or under the supervision of a physician or other licensed health care professional.

### Facilities

Waco, Inc. must provide change rooms for decontamination and ensure facilities prevent cross-contamination. Washing facilities shall be readily accessible for removing chromium from the skin. Workers must wash their hands and face or any other potentially exposed skin before eating, drinking or smoking.

### **Regulated Areas**

Regulated areas shall be established when exposure to an employee is or is expected to be in excess of the PEL. Regulated areas shall be marked with warning signs to alert employees and access is restricted to authorized persons only.

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## Controls

If the exposure level is above the PEL for 30 days or more then engineering controls and work practices shall be provided to reduce exposure to the lowest feasible level. If employees can demonstrate that such controls are not feasible Waco, Inc. shall use engineering and or work controls to reduce employee exposure to the lowest levels achievable and shall supplement them by the use of required respiratory protection.

## Recordkeeping

Waco, Inc. is required to maintain and make available an accurate record of all employee exposure monitoring, medical surveillance and training records.

## **Respiratory Protection & PPE**

The appropriate respirator shall be used when engineering controls and work practices cannot reduce employee exposure during work operations where engineering controls and work practices are not feasible and emergencies. Respirators shall be provided in accordance with 1910.134 (Respiratory Protection) (see Waco, Inc. Respiratory Protection Program). Specific requirements contained within 1926.1127 (Cadmium) regarding respiratory protection shall also be followed including:

- Providing employees with full face piece respirators when they experience eye irritation.
- Providing HEPA filters for powered and non-powered air-purifying respirators.
- Providing a powered air-purifying respirator instead of a negative-pressure respirator when an employee entitled to a respirator chooses to use this type of respirator and such a respirator will provide adequate protection to the employee.

PPE will be provided when there is a hazard from skin or eye contact and employees are required to use the PPE. Gloves, aprons, coveralls, goggles, foot covers and other as needed PPE shall be provided at no cost to the employee and will be removed at the end of the work shift. Waco, Inc. must clean, launder and replace all protective clothing as needed.

### Housekeeping

All surfaces shall be maintained as free as practicable of chromium. All spills and releases of chromium shall be cleaned promptly with approved procedures including use of HEPA filtered vacuums as the primary method, dry or wet sweeping or other methods to minimize the likelihood of exposure to chromium.

No compressed air shall be used to remove chromium from any surface unless the compressed air is used in conjunction with a ventilation system designed to capture the dust cloud created by the compressed air or no alternative method is feasible.

Cleaning equipment must be handled in a manner that minimizes the reentry of chromium into the workplace.

### Training

Waco, Inc. shall provide appropriate types of training for employees who are potentially exposed to chromium or cadmium prior to their initial assignment and annually thereafter. Waco, Inc. will assure employee participation and maintain a record of the training contents. This training includes:

- Hazard communication training for potentially exposed employees.
- Training specified by the applicable chromium or cadmium standard for workers exposed at the action level for any one day, or who are exposed to chromium or cadmium compounds that are skin irritants.

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- Respirator training if respirators are to be used.
- Provide information to workers regarding task-specific chromium or cadmium hazards and control methods, the JSA, work practices, medical surveillance and other applicable information, including any changes that are made to these controls.
- Provide training annually, as appropriate, to workers who continue to have exposure to chromium or cadmium at or above the action level on any one day.
- All training will be recorded and include the identity of the employee trained, the signature of the person who conducted the training and the date of the training.
- Training records must be kept for one year.

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COLD WEATHER SAFETY / COLD STRESS			Next Review Date:	02/01/2025
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# Purpose

The purpose of this program is to address control measures to protect Waco, Inc. employees from stress or injuries when working in cold temperatures.

## Scope

Each Waco, Inc. worksite shall implement a site specific cold weather/cold stress hazard assessment and have the control plan approved by the Waco, Inc. Safety Manager.

## Responsibilities

### Safety Manager

- identify and conduct an assessment of , tasks and occupations where there is the potential for cold stress
- implement and/or provide controls (engineering, administrative or personal protective equipment) to minimize cold stress
- provide training and education regarding cold stress, including early signs and symptoms of cold-related exposure

#### Worker Responsibilities

- adhere to all control measures or work procedures that have been designed and implemented to reduce exposure to conditions that could cause cold stress
- leave cold environments if signs or symptoms of cold-related stress appear
- wear all required cold temperature clothing and PPE
- immediately report any signs or symptoms of cold-related stress

### **Cold Temperature Procedures**

### Health Effects of Cold Stress

Warning signs of hypothermia can include complaints of nausea, fatigue, dizziness, irritability or euphoria. Workers can also experience pain in their extremities (hands, feet, ears, etc.), and severe shivering. Workers should be moved to a heated shelter and seek medical advice when appropriate.

### Hazard Assessment

An assessment will be conducted by the Safety Manager to identify the types of jobs or employees who are at risk for cold exposure. Jobs that are at risk for cold exposure include, but are not limited to: airport ground personnel, auto repair and refueling, cold storage, construction and demolition, ice making, logging, mining, oil and gas drilling, pulp and paper, railroad and trucking, snow and trash removal, utility repair and warehousing. The assessment must also consider employees who work inside but have to go outside for any portion of the shift to either perform work or to travel to transportation departure or arrival points.

## Facilities

• Regularly used walkways and travel ways shall be sanded, salted or cleared of snow and ice as soon as practicable.

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- Employees will be informed of the dangers associated with working around unstable snow and ice buildups. All employees will be informed of the dangers and destructive potential caused by unstable snow build-up, sharp icicles, ice dams and know how to prevent incidents caused by them.
- When dangerous overhead build-ups of snow or ice are present barricades will be used to prevent staff from walking or driving into potential fall zones.

# Clothing, PPE and Supplies

Proper cold weather protection must be worn by employees when working in cold, wet and windy conditions. Protective clothing is the most important way to avoid cold stress. The type of fabric also makes a difference.

Cotton loses its insulation value when it becomes wet. Wool, silk and most synthetics, on the other hand, retain their insulation even when wet. The following are recommendations for working in cold environments:

- Wear at least three layers of clothing. An inner layer of wool, silk or synthetic to wick moisture away from the body a middle layer of wool or synthetic to provide Insulation even when hot an outer wind and rain protection layer that allows some ventilation to prevent overheating.
- Wear a hat or hood. Up to 40% of body heat can be lost when the head is left exposed.
- Keep a change of dry clothing available in case work clothes become wet.
- With the exception of the wicking layer do not wear tight clothing. Loose clothing allows bettor ventilation of heat away from the body.
- Do not underestimate the wetting effects of perspiration. Oftentimes wicking and venting of the body's sweat and heat are more important than protecting from rain or snow.
- Wear insulated boots or other footwear. Felt-lined, rubber bottomed, leather-topped boots with removable felt insoles are best suited for heavy work in cold since leather is porous, allowing the boots to "breathe" and let perspiration evaporate.
- Liner socks made from polypropylene will help keep feet dry and warmer by wicking sweat away from the skin. Always wear the right thickness of socks for your boots.
- In extremely cold conditions, where face protection is used, eye protection must be separated from the nose and mouth to prevent exhaled moisture from fogging and frosting eye shields or glasses.
- Clothing must be dry. Moisture should be kept off clothes by removing snow prior to entering heated shelters.

Cold weather supplies will be regularly inspected and restocked when necessary by Waco, Inc.. Regular inspections on cold weather supplies such as hand warmers, jackets, shovels, etc. will be carried out to ensure that supplies are always in stock.

## Preventative Controls That Are Implemented to Avoid Cold Induced Injuries

- Workers will be under constant protective observation by a co-worker or supervisor. Waco, Inc. will implement a "Buddy System" to ensure that no employee is working alone in cold work environments.
- Some preventive measures include drinking plenty of liquids, avoiding caffeine and alcohol.
- It is easy to become dehydrated in cold weather. If possible, heavy work should be scheduled during the warmer parts of the day.
- Take breaks out of the cold.
- Try to work in pairs to keep an eye on each other and watch for signs of cold stress.
- Avoid fatigue since energy is needed to keep muscles warm.
- Take frequent breaks and consume warm, high calorie food such as pasta to maintain energy reserves.

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- If a worker exposed to cold shows signs or reports symptoms of cold stress or injury the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician.
- For continuous work in temperatures below the freezing point, heated warming shelters such as tents, cabins or rest rooms should be available. The work should be paced to avoid excessive sweating. If such work is necessary, proper rest periods in a warm area should be allowed and employees should change into dry clothes.
- New employees should be given enough time to get acclimatized to cold and protective clothing before assuming a full work load.
- For work below the freezing point, metal handles and bars should be covered by thermal insulating material. Also, machines and tools should be designed so that they can be operated without having to remove mittens or gloves.

# Training

Waco, Inc. employees who are required to work in cold weather conditions will receive initial and annual training regarding the health effects of cold exposure and proper rewarming procedures, recognition of and first aid for frostbite and hypothermia, required protective clothing, proper use of warming shelters, the buddy system, maintaining communications, vehicle breakdown procedures and proper eating and drinking habits for working in the cold.

## Health Effects

Where employees are exposed to work conditions that may present a hazard because of excessive cold Waco, Inc. shall ensure that a competent person provides training to ensure the employees are familiar with the signs and symptoms of cold weather induced health problems such as hypothermia, frostbite and trench foot. Training will include:

- Hypothermia occurs when body heat is lost faster than it can be replaced. When the core body temperature drops below the normal 98.6°F to around 95°F the onset of symptoms normally begins. The person may begin to shiver and stomp their feet in order to generate heat. Workers may lose coordination, have slurred speech and fumble with items in the hand. The skin will likely be pale and cold.
- Frostbite occurs when tile skin actually freezes and loses water. In severe cases, amputation of the frostbitten area may be required. While frostbite usually occurs when the temperatures are 30°F or lower, wind chill factors can allow frostbite to occur in above freezing temperatures. Frostbite typically affects the extremities, particularly the feet and hands. The affected body part will be cold, tingling, stinging or aching followed by numbness. Skin color tums red, then purple, then white and is cold to tile touch. There may be blisters in severe cases.
- Trench Foot or immersion foot is caused by having feet immersed in cold water at temperatures above freezing for long periods of trine. It is similar to frostbite, but considered less severe. Symptoms usually consist of tingling, itching or a burning sensation. Blisters may be present.

Workers and supervisors involved with work in cold environments should be informed about symptoms of adverse effect exposure to cold, proper clothing habits, safe work practices, physical fitness requirements for work in cold,

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and emergency procedures in case of cold injury. While working in cold, a buddy system should be used. Look out for one another and be alert for the symptoms of hypothermia.

# **First Aid Training**

Employees will be trained to administer proper first aid treatment on cold induced injuries or illnesses. All Waco, Inc. employees who are required to perform work in cold conditions will be knowledgeable on how to administer first aid treatment on cold induced injuries or illnesses.

All training shall be documented.

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COMPRESSED GAS CYLINDERS			Next Review Date:	02/01/2025
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## Purpose:

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

### Scope

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

## **Key Responsibilities**

#### Managers/Supervisors

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

#### Employees

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

#### Procedure

#### General

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

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

#### **Cylinder Identification**

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

#### Handling

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

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

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

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

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

## Storing

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

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

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

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

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

### Use

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

Never force or modify connections.

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

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

Valves must be closed when cylinders are not in use.

Cylinders shall not be used as rollers or supports.

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

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

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

#### **Inspection of Compressed Gas Cylinders**

WACO, INC. shall determine that compressed gas cylinders under its control are in a safe condition to the extent that this can be determined by visual inspection. Visual and other inspections shall be conducted as prescribed in the Hazardous Materials Regulations of the Department of Transportation (49 CFR parts 171-179 and 14 CFR part 103). Where those regulations are not applicable, visual and other inspections shall be conducted in accordance

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with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962. Some elements include, but are not limited to:

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

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

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

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

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

### **Leaking Cylinders**

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

### Transportation

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

### **Empty Cylinder Marking**

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

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# **Engineering Controls**

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

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CONFINED SPACE/PERMIT CONFINED SPACE			Next Review Date:	02/01/2025
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## Purpose

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

## Scope

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

## Definitions

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

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

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

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

### **Confined Space**

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

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

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

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

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

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

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

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

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

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

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

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

 Note: Some materials -- hydrogen fluoride gas and cadmium vapor, for example -- may produce immediate transient effects that, even if severe, may pass without medical attention, but are followed by sudden, possibly fatal collapse 12-72 hours after exposure. The victim "feels normal" from recovery from transient effects until collapse. Such materials in hazardous quantities are considered to be "immediately dangerous to life or health".

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

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

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

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

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

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

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

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

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

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

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

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

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

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# Responsibilities

## Managers/Supervisor

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

### Affected Employee

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

### Authorized Entry Supervisor Duties

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

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

# Authorized Attendant Duties

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

# Authorized Entrant Duties

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

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

### Procedure

### **Non-Permit Confined Space Entry**

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

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

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

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

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

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

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# Permit-Required Confined Space Entry

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

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

# Pre-Job Planning and Space Preparation

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

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

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

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

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

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

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

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

### Pre-Entry Safety Meeting

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

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

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

### Equipment

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

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

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

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

# Air Monitoring

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

### Ventilation

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

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

### Multiple Employer Procedure

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

• Verify that all contractor employees have been trained in confined space and that all contractor employees fully understand the Waco, Inc. procedures pertaining to Confined Space.

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

### Rescue and Emergency Services

### <u>General</u>

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

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

### Permit-Required Confined Space Rescue:

- When the Attendant becomes aware of the need for rescue, the Attendant shall immediately summon the onsite rescue team by the agreed upon communication method, verbally, radio or cell phone, without leaving the vicinity of the confined space.
- The Attendant shall prevent unauthorized personnel from attempting a rescue.
- After the rescue team has been notified, the Attendant shall alert the Entry Supervisor of the emergency via the same communication methods.

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

### Non-entry Rescue

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

# Issuance/Reviewing of Permit

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

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

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

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### Termination and Closing or Cancelling of Permits

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

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

### Training

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

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

The employee shall be retrained:

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

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

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

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

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### Purpose

Overhead cranes, hoists, and rigging equipment are used by Waco, Inc. employees for lifting and moving materials. In order to maintain a safe workplace for its employees and comply with new regulations, only qualified individuals shall operate these devices. This program outlines the procedures for safe operations and the training requirements regarding overhead cranes, hoists and rigging equipment.

### Scope

Applies to all Waco, Inc. employees who operate overhead cranes, hoists, and rigging equipment in the scope of their job duties and assignments. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Waco, Inc. employees and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

### Definitions

A/D director (Assembly/Disassembly director) means an individual who meets this subpart's requirements for an A/D director, irrespective of the person's formal job title or whether the person is non-management or management personnel.

Articulating crane means a crane whose boom consists of a series of folding, pin connected structural members, typically manipulated to extend or retract by power from hydraulic cylinders.

Assembly/Disassembly means the assembly and/or disassembly of equipment covered under this standard. With regard to tower cranes, "erecting and climbing" replaces the term "assembly," and "dismantling" replaces the term "disassembly." Regardless of whether the crane is initially erected to its full height or is climbed in stages, the process of increasing the height of the crane is an erection process.

Assist crane means a crane used to assist in assembling or disassembling a crane.

Attachments means any device that expands the range of tasks that can be done by the equipment. Examples include, but are not limited to: an auger, drill, magnet, pile-driver, and boom-attached personnel platform.

Audible signal means a signal made by a distinct sound or series of sounds. Examples include, but are not limited to, sounds made by a bell, horn, or whistle.

*Blocking* (also referred to as "cribbing") is wood or other material used to support equipment or a component and distribute loads to the ground. It is typically used to support lattice boom sections during assembly/ disassembly and under outrigger and stabilizer floats.

*Boatswain's chair* means a single-point adjustable suspension scaffold consisting of a seat or sling (which may be incorporated into a full body harness) designed to support one employee in a sitting position.

*Bogie* means "travel bogie," which is defined below.

Boom (equipment other than tower crane) means an inclined spar, strut, or other long structural member which supports the upper hoisting tackle on a crane or derrick. Typically, the length and vertical angle of the boom can be varied to achieve increased height or height and reach when lifting loads. Booms can usually be grouped into general categories of hydraulically extendible, cantilevered type, latticed section, cable supported type or articulating type.

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Boom (tower cranes): On tower cranes, if the "boom" (i.e., principal horizontal structure) is fixed, it is referred to as a jib; if it is moveable up and down, it is referred to as a boom.

Boom angle indicator means a device which measures the angle of the boom relative to horizontal.

Boom hoist limiting device includes boom hoist disengaging device, boom hoist shutoff, boom hoist disconnect, boom hoist hydraulic relief, boom hoist kick-outs, automatic boom stop device, or derricking limiter. This type of device disengages boom hoist power when the boom reaches a predetermined operating angle. It also sets brakes or closes valves to prevent the boom from lowering after power is disengaged.

Boom length indicator indicates the length of the permanent part of the boom (such as ruled markings on the boom) or, as in some computerized systems, the length of the boom with extensions/attachments.

*Boom stop* includes boom stops, (belly straps with struts/standoff), telescoping boom stops, attachment boom stops, and backstops. These devices restrict the boom from moving above a certain maximum angle and toppling over backward.

*Boom suspension system* means a system of pendants, running ropes, sheaves, and other hardware which supports the boom tip and controls the boom angle.

Builder means the builder/constructor of equipment.

*Center of gravity*: The center of gravity of any object is the point in the object around which its weight is evenly distributed. If you could put a support under that point, you could balance the object on the support.

*Certified welder* means a welder who meets nationally recognized certification requirements applicable to the task being performed.

*Climbing* means the process in which a tower crane is raised to a new working height, either by adding additional tower sections to the top of the crane (top climbing), or by a system in which the entire crane is raised inside the structure (inside climbing).

*Come-a-long* means a mechanical device typically consisting of a chain or cable attached at each end that is used to facilitate movement of materials through leverage.

*Competent person* means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

*Controlled load lowering* means lowering a load by means of a mechanical hoist drum device that allows a hoisted load to be lowered with maximum control using the gear train or hydraulic components of the hoist mechanism. Controlled load lowering requires the use of the hoist drive motor, rather than the load hoist brake, to lower the load.

*Controlling entity* means an employer that is a prime contractor, general contractor, construction manager or any other legal entity which has the overall responsibility for the construction of the project – its planning, quality and completion.

*Counterweight* means a weight used to supplement the weight of equipment in providing stability for lifting loads by counterbalancing those loads.

Crane/derrick includes all equipment covered by this subpart.

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*Crawler crane* means equipment that has a type of base mounting which incorporates a continuous belt of sprocket driven track.

*Crossover points* means locations on a wire rope which is spooled on a drum where one layer of rope climbs up on and crosses over the previous layer. This takes place at each flange of the drum as the rope is spooled onto the drum, reaches the flange, and begins to wrap back in the opposite direction.

*Dedicated channel* means a line of communication assigned by the employer who controls the communication system to only one signal person and crane/derrick or to a coordinated group of cranes/derricks/signal person(s).

*Dedicated pile-driver* is a machine that is designed to function exclusively as a pile driver. These machines typically have the ability to both hoist the material that will be pile-driven and to pile-drive that material.

Dedicated spotter (power lines): To be considered a dedicated spotter, the requirements of § 1926.1428 (Signal person qualifications) must be met and his/her sole responsibility is to watch the separation between the power line and: the equipment, load line and load (including rigging and lifting accessories), and ensure through communication with the operator that the applicable minimum approach distance is not breached.

*Directly under the load* means a part or all of an employee is directly beneath the load.

Dismantling includes partial dismantling (such as dismantling to shorten a boom or substitute a different component).

Drum rotation indicator means a device on a crane or hoist which indicates in which direction and at what relative speed a particular hoist drum is turning.

*Electrical contact* occurs when a person, object, or equipment makes contact or comes in close proximity with an energized conductor or equipment that allows the passage of current.

Employer-made equipment means floating cranes/derricks designed and built by an employer for the employer's own use.

*Encroachment* is where any part of the crane, load line or load (including rigging and lifting accessories) breaches a minimum clearance distance that this subpart requires to be maintained from a power line.

Equipment means equipment covered by this subpart.

Equipment criteria means instructions, recommendations, limitations and specifications.

Fall protection equipment means guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems.

*Fall restraint system* means a fall protection system that prevents the user from falling any distance. The system is comprised of either a body belt or body harness, along with an anchorage, connectors and other necessary equipment. The other components typically include a lanyard, and may also include a lifeline and other devices.

*Fall zone* means the area (including but not limited to the area directly beneath the load) in which it is reasonably foreseeable that partially or completely suspended materials could fall in the event of an accident.

Flange points are points of contact between rope and drum flange where the rope changes layers.

*Floating cranes/derricks* means equipment designed by the manufacturer (or employer) for marine use by permanent attachment to a barge, pontoons, vessel or other means of floation.

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For example means "one example, although there are others."

*Free fall (of the load line)* means that only the brake is used to regulate the descent of the load line (the drive mechanism is not used to drive the load down faster or retard its lowering).

*Free surface effect* is the uncontrolled transverse movement of liquids in compartments which reduce a vessel's transverse stability.

Hoist means a mechanical device for lifting and lowering loads by winding a line onto or off a drum.

*Hoisting* is the act of raising, lowering or otherwise moving a load in the air with equipment covered by this standard. As used in this standard, "hoisting" can be done by means other than wire rope/ hoist drum equipment.

Include/including means "including, but not limited to."

*Insulating link/device* means an insulating device listed, labeled, or accepted by a Nationally Recognized Testing Laboratory in accordance with 29 CFR 1910.7.

Jib stop (also referred to as a jib backstop), is the same type of device as a boom stop but is for a fixed or luffing jib.

Land crane/derrick is equipment not originally designed by the manufacturer for marine use by permanent attachment to barges, pontoons, vessels, or other means of floatation.

List means the angle of inclination about the longitudinal axis of a barge, pontoons, vessel or other means of floatation.

Load refers to the object(s) being hoisted and/or the weight of the object(s); both uses refer to the object(s) and the loadattaching equipment, such as, the load block, ropes, slings, shackles, and any other ancillary attachment.

Load moment (or rated capacity) indicator means a system which aids the equipment operator by sensing (directly or indirectly) the overturning moment on the equipment, i.e., load multiplied by radius. It compares this lifting condition to the equipment's rated capacity, and indicates to the operator the percentage of capacity at which the equipment is working. Lights, bells, or buzzers may be incorporated as a warning of an approaching overload condition.

Load moment (or rated capacity) limiter means a system which aids the equipment operator by sensing (directly or indirectly) the overturning moment on the equipment, i.e., load multiplied by radius. It compares this lifting condition to the equipment's rated capacity, and when the rated capacity is reached, it shuts off power to those equipment functions which can increase the severity of loading on the equipment, e.g., hoisting, telescoping out, or luffing out. Typically, those functions which decrease the severity of loading on the equipment remain operational, e.g., lowering, telescoping in, or luffing in.

Locomotive crane means a crane mounted on a base or car equipped for travel on a railroad track.

Luffing jib limiting device is similar to a boom hoist limiting device, except that it limits the movement of the luffing jib.

Marine hoisted personnel transfer device means a device, such as a "transfer net," that is designed to protect the employees being hoisted during a marine transfer and to facilitate rapid entry into and exit from the device. Such devices do not include boatswain's chairs when hoisted by equipment covered by this standard.

*Marine worksite* means a construction worksite located in, on or above the water.

*Mobile crane* means a lifting device incorporating a cable suspended latticed boom or hydraulic telescopic boom designed to be moved between operating locations by transport over the road.

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Moving point-to-point means the times during which an employee is in the process of going to or from a work station.

*Multi-purpose machine* means a machine that is designed to be configured in various ways, at least one of which allows it to hoist (by means of a winch or hook) and horizontally move a suspended load. For example, a machine that can rotate and can be configured with removable forks/tongs (for use as a forklift) or with a winch pack, jib (with a hook at the end) or jib used in conjunction with a winch. When configured with the forks/tongs, it is not covered by this subpart. When configured with a winch pack, jib (with a hook at the end) or jib used in conjunction with a winch, it is covered by this subpart.

*Nationally recognized accrediting agency* is an organization that, due to its independence and expertise, is widely recognized as competent to accredit testing organizations. Examples of such accrediting agencies include, but are not limited to, the National Commission for Certifying Agencies and the American National Standards Institute.

*Nonconductive* means that, because of the nature and condition of the materials used, and the conditions of use (including environmental conditions and condition of the material), the object in question has the property of not becoming energized (that is, it has high dielectric properties offering a high resistance to the passage of current under the conditions of use).

*Operational aids* are devices that assist the operator in the safe operation of the crane by providing information or automatically taking control of a crane function. These include, but are not limited to, the devices listed in § 1926.1416 ("listed operational aids").

Operational controls means levers, switches, pedals and other devices for controlling equipment operation.

Operator means a person who is operating the equipment.

*Overhead and gantry cranes* includes overhead/bridge cranes, semi gantry, cantilever gantry, wall cranes, storage bridge cranes, launching gantry cranes, and similar equipment, irrespective of whether it travels on tracks, wheels, or other means.

Paragraph refers to a paragraph in the same section of this subpart that the word "paragraph" is used, unless otherwise specified.

*Pendants* includes both wire and bar types. Wire type: a fixed length of wire rope with mechanical fittings at both ends for pinning segments of wire rope together. Bar type: instead of wire rope, a bar is used. Pendants are typically used in a latticed boom crane system to easily change the length of the boom suspension system without completely changing the rope on the drum when the boom length is increased or decreased.

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

*Portal crane* is a type of crane consisting of a rotating upper structure, hoist machinery, and boom mounted on top of a structural gantry which may be fixed in one location or have travel capability. The gantry legs or columns usually have portal openings in between to allow passage of traffic beneath the gantry.

Power lines means electric transmission and distribution lines.

Procedures include, but are not limited to: instructions, diagrams, recommendations, warnings, specifications, protocols and limitations.

*Proximity alarm* is a device that provides a warning of proximity to a power line and that has been listed, labeled, or accepted by a Nationally Recognized Testing Laboratory in accordance with 29 CFR 1910.7.

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*Qualified evaluator (not a third party)* means a person employed by the signal person's employer who has demonstrated that he/she is competent in accurately assessing whether individuals meet the Qualification Requirements in this subpart for a signal person.

*Qualified evaluator (third party)* means an entity that, due to its independence and expertise, has demonstrated that it is competent in accurately assessing whether individuals meet the Qualification Requirements in this subpart for a signal person.

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

Qualified rigger is a rigger who meets the criteria for a qualified person.

*Range control limit device* is a device that can be set by an equipment operator to limit movement of the boom or jib tip to a plane or multiple planes.

*Range control warning device* is a device that can be set by an equipment operator to warn that the boom or jib tip is at a plane or multiple planes.

*Rated capacity* means the maximum working load permitted by the manufacturer under specified working conditions. Such working conditions typically include a specific combination of factors such as equipment configuration, radii, boom length, and other parameters of use.

Rated capacity indicator: See load moment indicator.

Rated capacity limiter: See load moment limiter.

*Repetitive pickup points* refer to, when operating on a short cycle operation, the rope being used on a single layer and being spooled repetitively over a short portion of the drum.

Running wire rope means a wire rope that moves over sheaves or drums.

*Runway* means a firm, level surface designed, prepared and designated as a path of travel for the weight and configuration of the crane being used to lift and travel with the crane suspended platform. An existing surface may be used as long as it meets these criteria.

Section means a section of this subpart, unless otherwise specified.

Sideboom crane means a track-type or wheel-type tractor having a boom mounted on the side of the tractor, used for lifting, lowering or transporting a load suspended on the load hook. The boom or hook can be lifted or lowered in a vertical direction only.

Special hazard warnings means warnings of site-specific hazards (for example, proximity of power lines).

Stability (flotation device) means the tendency of a barge, pontoons, vessel or other means of flotation to return to an upright position after having been inclined by an external force.

Standard Method means the protocol in Appendix A of this subpart for hand signals.

Such as means "such as, but not limited to."

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*Tagline* means a rope (usually fiber) attached to a lifted load for purposes of controlling load spinning and pendular motions or used to stabilize a bucket or magnet during material handling operations.

Tilt up or tilt down operation means raising/lowering a load from the horizontal to vertical or vertical to horizontal.

Tower crane is a type of lifting structure which utilizes a vertical mast or tower to support a working boom (jib) in an elevated position. Loads are suspended from the working boom. While the working boom may be of the fixed type (horizontal or angled) or have luffing capability, it can always rotate to swing loads, either by rotating on the top of the tower (top slewing) or by the rotation of the tower (bottom slewing). The tower base may be fixed in one location or ballasted and moveable between locations. Mobile cranes that are configured with luffing jib and/or tower attachments are not considered tower cranes under this section.

*Travel bogie (tower cranes)* is an assembly of two or more axles arranged to permit vertical wheel displacement and equalize the loading on the wheels.

Trim means angle of inclination about the transverse axis of a barge, pontoons, vessel or other means of floatation.

*Two blocking* means a condition in which a component that is uppermost on the hoist line such as the load block, hook block, overhaul ball, or similar component, comes in contact with the boom tip, fixed upper block or similar component. This binds the system and continued application of power can cause failure of the hoist rope or other component.

Unavailable procedures means procedures that are no longer available from the manufacturer, or have never been available, from the manufacturer.

*Upperworks* means the revolving frame of equipment on which the operating machinery (and many cases the engine) are mounted along with the operator's cab. The counterweight is typically supported on the rear of the upperstructure and the boom or other front end attachment is mounted on the front.

Up to means "up to and including."

Wire rope means a flexible rope constructed by laying steel wires into various patterns of multi-wired strands around a core system to produce a helically wound rope.

### What is Not Defined as a Crane

- Forklifts, Track Loaders, Excavators (Track Hoe/Backhoe), Concrete Pump Trucks w/boom
- Power Shovels, Digger Derricks, Tow Trucks, Vehicle Mounted Work Platforms
- Self-propelled Elevating Work Platforms, Stacker Cranes, Mechanic's Trucks With Hoisting Devices
- Come-A-Longs and Chain Falls, Gin Poles For Communication Tower Work
- Tree Trimming and tree removal work
- Anchor handling with a vessel or barge using an affixed A-frame

### **Key Responsibilities**

#### Managers and Supervisors

• Are responsible to ensure that employees and contractors are trained and qualified on the proper operations and have been trained in crane and hoist safety.

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- Shall ensure modifications or additions that may affect the capacity or safe operation of the equipment must not be made without written approval from the manufacturer or approval from a registered professional engineer. The manufacturer must approve all modifications/additions in writing. A registered professional engineer must be qualified with respect to the equipment involved and must ensure the original safety factor of the equipment is not reduced.
- Shall ensure all manufacturer procedures applicable to the operational function of equipment must be complied with. All manufacturer procedures applicable to the operational functions of equipment, including its use with attachments, must be complied with.
- Are responsible to see that all provisions of this program are followed and that crane inspections are performed and the equipment is in safe operating condition.
- Are responsible for identifying hazard areas by marking the boundaries of the crane swing radius with warning lines, railings or similar barriers or other safety measures to be used when the equipment has the potential to strike and injure an employee or pinch/crush an employee against any other object.

# Employees

- Employee operators are responsible to follow the requirements of this program and report any damage or needed repairs immediately to their supervisor.
- Operators must meet the physical qualifications, pass a physical, a written examination, understand and be able to use a load chart as well as calculate loads for the crane type operated.
- Employees designated as crane operators are responsible for the entire lift. In addition, crane operators are responsible to:
  - Make the required inspections,
  - Ensure that the crane is maintained,
  - Ensure that all personnel working in the area around the crane are kept clear of all hazards related to crane operations.
  - o Determine the weights, and correct rigging required for loads to be lifted.

# Crane Operator Certification/Qualification

Operators must be determined to be qualified before they are permitted to operate any crane. Only those employees qualified by training or experience shall be allowed to operate equipment and machinery.

Within 4 years of November 8th 2010, Waco, Inc. must ensure operators must be qualified/certified by one of the following methods:

# Certification by an Accredited Crane Operator Testing Organization

- Accredited by a nationally recognized accrediting agency
- Certification is portable
- Valid for five years
- Program must be reviewed by a nationally recognized accrediting agency every three years

### Qualification by an Audited Employer Program

- Developed or approved by an auditor certified by an accredited crane operator testing organization
- Auditor is not an employee of Waco, Inc.

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- Tests should be administered per nationally recognized test administration standards
- Program shall be audited within the first three months, then once every three years
- Qualification is not portable and valid for five years

### Qualification by the U.S. Military

### Licensing by a Government Entity

- Must meet or exceed requirements of the OSHA standard
- Valid only within the jurisdiction of the government entity
- Valid for time specified by the government entity, but no longer than five years

### **Certification/Qualification Criteria**

### Pass written test that include:

- Controls and operational performance
- Ability to calculate the load/capacity
- Procedures for power line contact
- Site preparation
- Ability to read manuals/charts relevant to the equipment being operated

### Pass practical examination

### Ability to perform a pre-shift inspection

### Operational and maneuvering skills

### Application of load chart information

### Application of safe shut down and securing procedures

### **Administrative Criteria**

- Waco, Inc. must revoke operator's certification if they have reason to believe the employee is not qualified to operate.
- The current training records must be on file during the operator's employment.

### **Rigger Qualifications**

Riggers assemble, rig, hook and unhook, guide, and disassemble crane equipment and materials. Riggers must meet the requirements of a qualified person. A qualified rigger is a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to resolve problems relating to the subject matter, the work, or the project.

Riggers must be trained in all the requirements of the regulations that apply to their respective roles. For example, riggers must be trained and qualified to perform assembly and disassembly operations when their job tasks require them to perform such operations.

### **Signal Person Qualification**

All signal persons must be qualified to give signals. In order to be qualified, the signal person must:

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- Know and understand the type of signals used; if hand signals are used, the signal person must know and understand the Standard Method for hand signals.
- Be competent in the application of the type of signals used.
- Have a basic understanding of equipment operation and limitations, including the crane dynamics involved in swinging and stopping loads and boom deflection from hoisting loads.
- Know and understand the regulatory requirements for signals (29 CFR 1926.1419 to 1926.1422) and the signal person qualifications (29 CFR 1926.1428).
- Demonstrate that he or she meets the qualification requirements for signalers through an oral or written test and through a practical test.

# Signal Person Evaluations

The qualification of signal persons must be evaluated and documented by either:

- A third party qualified evaluator, or
- The employer's qualified evaluator (i.e., an employee competent in accurately assessing whether the signaler has met the qualification requirements)

### Signal Person Refresher Training

If subsequent actions by the signal person indicate that the individual does not meet the Qualification Requirements, Waco, Inc. must not allow the individual to continue working as a signal person until retraining is provided and a reassessment is made that confirms that the individual meets the Qualification Requirements.

### **Documentation of Signaler Qualification**

Waco, Inc. must make the documentation for whichever option is used available at the site while the signal person is employed by Waco, Inc.. The documentation must specify each type of signaling (e.g. hand signals, radio signals) for which the signal person meets the requirements of the rule.

# Authority to Stop Operations

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

# **Ground Conditions**

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

Waco, Inc. will locate all hazards that are identified in all available documents and inform the crane user of them.

# **Overhead Power Lines and Power Line Safety in Crane Operations**

- No part of crane, line or load may be able to reach within 20 feet of a power line during setup. Exceptions: de-energized and grounded power lines or use of a dedicated spotter or proximity alarms.
- Assembly/disassembly below power lines is prohibited, unless line is de-energized and grounded.

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- All power lines are presumed to be energized unless confirmed to be de-energized by the utility owner/operator and visibly grounded at the worksite.
- All power lines presumed to be un-insulated.
- Employees shall understand limitations of insulating links, proximity alarms and range control devices, if used.
- Dedicated spotters shall be trained.
- There must be at least one electrocution hazard warning sticker conspicuously placed in the cab of the crane.

# Power Lines Safety

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

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

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

Voltage (kV)	Minimum Clearance Distance(feet)
Up to 50	10
50 to 200	15
200 to 350	20
350 to 500	25
500 to 750	35
750 to 1000	45
Over 1000	As established by the line owner

Some special requirements for working below power lines include training of operators and crew on:

- Procedures to follow after power line contact
- Danger of a potential energized zone
- Operator's emergency procedures
- Safest means to evacuate equipment
- Need for employees to avoid approach
- Safe clearance from power lines

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# **Required Equipment**

### Mandatory Safety Devices Equipment

All safety devices must be in proper working order before operation begins. Safety devices are required to be on all equipment and must be in proper working order before operations begin. If any of the devices are not in proper working order the equipment must be taken out of service and operations must not resume until the device is working properly again. The following is mandatory equipment:

- Crane level indicator
- Boom stops
- Jib stops
- Locks for foot pedal brakes
- Horns
- Integral check valves for hydraulic outriggers
- Rail clamps and stops for equipment on rails

The following required equipment must be in service except where specified temporary alternative measures are met:

- Boom hoist limiting device
- Luffing jib limiting device
- Anti two-block device (cranes manufactured after 2/28/92) Exception: lattice booms used for dragline, clam shell, scrap magnet, drop ball, marine operations and pile driving work
- Boom angle or radius indicator
- Jib angle indicator (luffing jibs)
- Boom length indicator (telescopic booms)
- Load weighing devices (load moment indicators, rated capacity indicators or rated capacity limiters cranes manufactured after 3/29/03
- Outrigger position indicators (cranes manufactured after 1/1/08)
- Hoist drum rotation indicator (if drum is not visible to operator)

An accessible fire extinguisher of 5BC rating, or higher, shall be available at all operator stations or cabs of equipment.

Procedures applicable to the operation of the equipment must be readily available in the cab at all times. The operator shall have access to procedures applicable to the operation of the equipment. Procedures include rated capacities (load charts), recommended operating speeds, special hazard warnings, instructions and operator's manual.

If the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block and this marking shall be clearly legible from the ground floor.

Whenever internal combustion engine powered equipment exhausts in enclosed spaces, test shall be made and recorded to see that employees are not exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres.

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# Material Hoists, Personnel Hoists and Elevators

### **General Requirements**

### Hoist Specifications

All material hoists must conform to the requirements of ANSI/ASME A10.5-1969, Safety Requirements for Material Hoists. Note: ANSI/ASME have updated this standard; however, OSHA allows Waco, Inc. to follow the updated consensus standard without penalty when it provides equal or greater employee protection.

Waco, Inc. must comply with the manufacturer's specifications and limitations for the operation of all hoists and elevators. Where manufacturer's specifications are not available, a professional engineer competent in the field must determine the limitations assigned to the equipment.

Rated load capacities, recommended operating speeds, and special hazard warnings or instructions must be posted on cars and platforms.

### Wire Rope

Hoisting ropes must be installed in accordance with the wire rope manufacturer's recommendations. Wire rope must be removed from service when any of the following conditions exists:

- In hoisting ropes, six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay
- Abrasion, scrubbing, flattening, or peening, causing loss of more than one-third of the original diameter of the outside wires
- Evidence of any heat damage resulting from a torch or any damage caused by contact with electrical wires
- Reduction from nominal diameter of more than three sixty-fourths in. for diameters up to and including three-fourths in.; one-sixteenth in. for diameters seven-eighths to 11/8.in.; and three thirty-seconds in. for diameters one and one-quarter in. to one and one-half.in.

### Prohibited Operations

The installation of live booms on hoists and the use of endless belt-type man lifts are prohibited.

The manufacturer's instructions, procedures and prohibitions must be followed and complied with when assembling and/or disassembling equipment.

### Material Hoists

Operating rules must be established and posted at the operator's station of the hoist. Such rules must include signal system and allowable line speed for various loads. Rules and notices must be posted on the car frame or crosshead in a conspicuous location, including the statement "No Riders Allowed." No person must be allowed to ride on material hoists except for the purposes of inspection and maintenance.

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# Protective Gates, Bars, and Coverings

All entrances of the hoistways must be protected by substantial gates or bars, which must guard the full width of the landing entrance. All hoistway entrance bars and gates must be painted with diagonal contrasting colors, such as black and yellow stripes.

Bars must be not less than 2- by 4-in. wooden bars or the equivalent, located 2 ft. from the hoistway line. Bars must be located neither less than 36 in. nor more than 42 in. above the floor. Gates or bars protecting the entrances to hoistways must be equipped with a latching device.

Overhead protective covering of 2-in. planking, 3/4-inch plywood, or other solid material of equivalent strength must be provided on the top of every material hoist cage or platform.

The operator's station of a hoisting machine must be provided with overhead protection equivalent to tight planking not less than 2 in. thick. The support for the overhead protection must be of equal strength.

### <u>Hoist Towers</u>

All material hoist towers must be designed by a licensed professional engineer. Hoist towers may be used with or without an enclosure on all sides. Whichever alternative is chosen, the following applicable conditions must be met:

- When a hoist tower is enclosed, it must be enclosed on all sides for its entire height with a screen enclosure of 1/2-in. mesh, No. 18 U.S. gauge wire or equivalent, except for landing access.
- When a hoist tower is not enclosed, the hoist platform or car must be totally enclosed (caged) on all sides for the full height between the floor and the overhead protective covering with 1/2-in. mesh of No. 14 U.S. gauge wire or equivalent. The hoist platform enclosure must include the required gates for loading and unloading. A 6-ft-high enclosure must be provided on the unused sides of the hoist tower at ground level.

Car-arresting devices must be installed to function in case of rope failure.

### **Personnel Hoists**

### **Specifications**

All personnel hoists used by employees must be constructed of materials and components that meet the specifications for materials, construction, safety devices, assembly, and structural integrity as stated in the ANSI/ASME A10.4-1963, Safety Requirements for Workmen's Hoists. ANSI/ASME have updated this standard; however, OSHA allows Waco, Inc. to follow the updated consensus standard without penalty when it provides equal or greater employee protection.

### Hoist Towers

Hoist towers outside the structure must be enclosed for the full height on the side or sides used for entrance and exit to the structure. At the lowest landing, the enclosure on the sides not used for exit or entrance to the structure must be enclosed to a height of at least 10 ft. Other sides of the tower adjacent to floors or scaffold platforms must be enclosed to a height of 10 ft. above the level of such floors or scaffolds. Towers inside of structures must be enclosed on all four sides throughout the full height. Towers must be anchored to the structure at intervals not exceeding 25 ft. In addition to tie-ins, a series of guys must be installed. Where tie-ins are

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not practical, the tower must be anchored by means of guys made of wire rope at least one-half in. in diameter, securely fastened to anchorage to ensure stability.

### Hoistway Doors and Gates

Hoistway doors or gates must be not less than 6 ft. 6 in. high and must be provided with mechanical locks that cannot be operated from the landing side, and must be accessible only to persons on the car. A door or gate must be provided at each entrance to the car, which must protect the full width and height of the car entrance. Doors or gates must be provided with electrical contacts that do not allow movement of the hoist when door or gate is open.

### <u>Cars</u>

Cars must be permanently enclosed on all sides and the top, except sides used for entrance and exit that have car gates or doors. Safeties must be capable of stopping and holding the car and rated load when traveling at governor tripping speed. Cars must be provided with a capacity and data plate secured in a conspicuous place on the car or crosshead. An emergency stop switch must be provided in the car and marked "Stop."

### <u>Covering</u>

Overhead protective covering of 2-in. planking, 3/4-in. plywood, or other solid material or equivalent strength must be provided on the top of every personnel hoist.

### Engine Prohibition

Internal combustion engines must not be permitted for direct drive.

### Stopping Device

Normal and final terminal stopping devices must be provided.

### <u>Ropes</u>

The minimum number of hoisting ropes used must be three for traction hoists and two for drum-type hoists. The minimum diameter of hoisting and counterweight wire ropes must be1/2 in. Following are the minimum safety factors for suspension wire ropes:

Rope speed (feet per minute)	Minimum factor of safety
50	7.60
75	7.75
100	7.95
125	8.10
150	8.25
600	10.70

See the chart at 29 CFR 1926.552(c)(14) for additional safety factors.

### Personnel Hoists Used in Bridge Tower Construction

Such hoists must be approved by a registered professional engineer and erected under the supervision of a qualified engineer competent in this field.

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When a hoist tower is not enclosed, the hoist platform or car must be totally enclosed (caged) on all sides for the full height between the floor and the overhead protective covering with 3/4-in. mesh of No. 14 U.S. gauge wire or equivalent. The hoist platform enclosure must include the required gates for loading and unloading.

These hoists must be inspected and maintained on a weekly basis. Whenever the hoisting equipment is exposed to winds exceeding 35 miles per hour, it must be inspected and put in operable condition before reuse.

Wire rope must be taken out of service when any of the following conditions exist:

- In running ropes, six randomly distributed broken wires in one lay or three broken wires in one strand in one lay
- Wear of one-third the original diameter of outside individual wires
- Kinking, crushing, bird caging, or any other damage resulting in distortion of the rope structure
- Evidence of any heat damage from any cause
- Reductions from nominal diameter of more than three sixty-fourths in. for diameters to and including three-fourths in., one-sixteenth in. for diameters seven-eights in. to 11/8 in. inclusive, three thirty-seconds in. for diameters 11/4 to 11/2 in. inclusive
- In standing ropes, more than two broken wires in one lay in sections beyond end connections or more than one broken wire at an end connection.

#### <u>Elevators</u>

Permanent elevators under the care and custody of Waco, Inc. and used by employees for work covered by this Act must comply with the requirements of ANSI/ASME A17.1-1965 with addenda A17.1a-1967, A17.1b-1968, A17.1c-1969, A17.1d-1970, and inspected in accordance with A17.2-1960 with addenda A17.2a-1965 and A17.2b-1967. ANSI/ASME have updated these standards; however, OSHA allows Waco, Inc. to follow the updated consensus standards without penalty when they provide equal or greater employee protection.

### **Base-Mounted Dum Hoists**

### Specifications

All base-mounted drum hoists in use must meet the applicable requirements for design, construction, installation, testing, inspection, maintenance, and operations, as prescribed by the manufacturer.

Waco, Inc. must ensure that exposed moving parts such as gears, projecting screws, setscrews, chain, cables, chain sprockets, and reciprocating or rotating parts that constitute a hazard are guarded.

All controls used during the normal operation cycle must be located within easy reach of the operator's station.

### **Electric Motor-Operated Hoists**

Electric motor-operated hoists must be provided with:

- A device to disconnect all motors from the line upon power failure and not permit any motor to be restarted until the controller handle is brought to the "off" position
- Where applicable, an over-speed preventive device
- A means whereby remotely operated hoists stop when any control is ineffective

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# **Overhead Hoists**

All overhead hoists in use must meet the applicable requirements for construction, design, installation, testing, inspection, maintenance, and operation, as prescribed by the manufacturer.

The safe working load of the overhead hoist, as determined by the manufacturer, must be indicated on the hoist, and this safe working load must not be exceeded.

The supporting structure to which the hoist is attached must have a safe working load equal to that of the hoist. The support must be arranged so as to provide for free movement of the hoist and must not restrict the hoist from lining itself up with the load.

The hoist must be installed only in locations that will permit the operator to stand clear of the load at all times.

Air hoists must be connected to an air supply of sufficient capacity and pressure to safely operate the hoist. All air hoses supplying air must be positively connected to prevent disconnected during use.

### Conveyors

#### Specifications

All conveyors in use must meet the applicable requirements for design, construction, inspection, testing, maintenance, and operation, as prescribed in the ANSI/ASME B20.1-1957, Safety Code for Conveyors, Cableways, and Related Equipment. ANSI/ASME have updated this standard; however, OSHA allows Waco, Inc. to follow updated consensus standards without penalty when they provide equal or greater employee protection.

Means for stopping the motor or engine must be provided at the operator's station. Conveyor systems must be equipped with an audible warning signal to be sounded immediately before starting up the conveyor. If the operator's station is at a remote point, similar provisions for stopping the motor or engine must be provided at the motor or engine location.

Emergency stop switches must be arranged so that the conveyor cannot be started again until the actuating stop switch has been reset to running or "on" position.

### Guards

Screw conveyors must be guarded to prevent employee contact with turning flights. Where a conveyor passes over work areas, aisles, or thoroughfares, suitable guards must be provided to protect employees required to work below the conveyors.

### Marking and Lockout/Tagout

All crossovers, aisles, and passageways must be conspicuously marked by suitable signs (see 29 CFR 1926.200). Conveyors must be locked out, or otherwise rendered inoperable, and tagged out with a "Do Not Operate" tag during repairs and when operation is hazardous to employees performing maintenance work.

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# **Rigging Practices**

Major incidents involving rigging operations are caused by:

- the failure of equipment from overloading, incorrect assembly or disassembly, or lack of proper maintenance;
- dropped or falling loads, usually as a result of the misuse or malfunction of hoisting lines and rigging; and
- lack of safeguards, especially in proximity to high-voltage lines. Training is key in minimizing the risk of incidents

An important element of the Waco, Inc. material handling program is proper rigging practices. Rigging of loads must be done with relative precision and performed by trained, experienced personnel. To ensure that safe practices are followed, a competent and qualified person must direct the assembly/disassembly of equipment. The assembly/disassembly of equipment must be directed by a competent and qualified person to see that:

- Rigging equipment that has the necessary capacity to do the job is available.
- Rigging equipment is in a safe working condition.
- Loads are rigged correctly.
- Safety of the rigging crew and other potentially exposed personnel is maintained.

### **Rigging and Sling Inspections and Safety Requirements**

- Only select rigging equipment that is in good condition.
- All rigging equipment shall be inspected annually; defective equipment is to be removed from service and destroyed to prevent inadvertent reuse.
- The load capacity limits shall be stamped or affixed to all rigging components.
- All devices shall be visually inspected prior to use and removed from service for any of the following conditions:
  - Nylon slings with:
    - Abnormal wear.
    - Torn stitching.
    - Broken or cut fibers.
    - Discoloration or deterioration.
  - Wire rope slings (see Wire Rope Inspection) with:
    - Kinking, crushing, bird caging, or other distortions.
    - Evidence of heat damage.
    - Cracks, deformation, or worn end attachments.
    - Six randomly broken wires in a single rope lay.
    - Three broken wires in one strand of rope.
    - Hooks opened more than 15% at the throat.
    - Hooks twisted sideways more than 10 degrees from the plane of the unbent hook.
  - Alloy steel chain slings with:
    - Cracked, bent, or elongated links or components.
    - Cracked hooks.
    - Shackles, eye bolts, turnbuckles, or other components that are damaged or deformed.

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### **Rigging a Load**

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

### Inspections

Inspection records and preventative maintenance records are maintained. This includes pre-erection inspections and assessment of ground conditions.

Following assembly and erection of hoists, and before being put in service, an inspection and test of all functions and safety devices must be made under the supervision of a competent person.

A similar inspection and test are required following major alteration of an existing installation.

All hoists must be inspected and tested at not more than 3-month intervals. Waco, Inc. must prepare a certification record, which includes the date the inspection and test of all functions and safety devices was performed; the signature of the person who performed the inspection and test; and a serial number, or other identifier, for the hoist that was inspected and tested. The most recent certification record must be maintained on file.

Cranes shall be inspected on the following schedule:

- After Modification
- After Repair Or Adjustment
- Post Assembly
- Each Shift
- Monthly
- Annual Comprehensive

Additional inspections will occur for the following situations:

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Severe Service

- Shock load, corrosive atmosphere, etc.
- Inspect exposed items/conditions
- Document

### Not In Regular Use

- Idle more than three months
- Monthly inspection must be performed
- Document

Cranes and hoists that have been overloaded shall be inspected prior to being returned to service. The inspection and testing requirements are included.

Initial inspection and test shall be performed by a qualified third party.

- Prior to initial use all new and altered cranes shall be inspected and tested to ensure compliance with the provisions of 29 CFR1910.179 and ABSI B30.2.
- Only after determining, by this inspection, testing and proper documentation, that the crane is in safe operating condition, shall it be put into service.

Waco, Inc. shall designate a competent person who shall inspect all machinery and equipment prior to each use, and during use, to make sure it is in safe operating condition. Any deficiencies shall be repaired, or defective parts replaced, before continued use. Daily pre-use inspections shall be performed by the crane operator (designated as Waco, Inc.'s designated competent person) prior to beginning shift and through observation during normal operation. Daily inspections shall include:

- Any deficiencies shall be repaired, or defective parts replaced, before continued use.
- All functional operating mechanisms for maladjustment interfering with proper operation.
- Deterioration or leakage in lines, tanks, valves, drain pumps, and other parts of air or hydraulic systems.
- Hooks, if deformations or cracks are found the hook shall be tagged out of service until repaired and tested by qualified personnel.
- Hoist chains, including end connections, for excessive wear, twist, distorted links interfering with proper function, or stretch beyond manufacturer's recommendations.

### Severe Service Inspection

Severe service inspections shall be conducted to inspect exposed items and conditions resulting from a shock load, corrosive atmosphere, etc. Inspections shall be documented.

### Not in Regular Use Inspection

If equipment is idle for more than three months a monthly inspection shall be performed before being placed in service. The same criteria for monthly inspections shall be followed.

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### **Monthly Inspection**

Monthly inspections of equipment by a competent person are documented. Equipment must be inspected monthly by a competent person and documented. Documentation must include the following:

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

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

If safety hazards are found during inspections, the equipment in question shall be tagged out and not used until repairs are made. Any deficiencies constituting a safety hazard shall cause the equipment to be tagged out of service until repairs are made.

### Annual Inspection

A thorough, annual inspection and functioning testing of the hoisting machinery shall be documented made by a qualified person, or by a government or private agency recognized by the U.S. Department of Labor using the detail inspection criteria per regulation. Waco, Inc. shall maintain a record of the dates and results of inspections for each hoisting machine and piece of equipment and kept on file for 12 months or until the next annual inspection.

### Wire Rope Inspection

Wire rope will be inspected on the following schedule:

- Shift Inspection Before each shift.
- Monthly Inspection All wire ropes, including running ropes and the inspection shall be documented.
- Annual Inspection At least every 12 months, unless not feasible due to set up. This will be a more detailed inspection including wire rope that is normally hidden during daily or monthly inspections and the inspection shall be documented.

A Waco, Inc. competent person will conduct visual inspections before each shift, monthly and annually for wire rope and categorize deficiencies in:

### Category I Deficiencies

- Significant distortion of the wire rope structure such as kinking, crushing, un-stranding, bird caging, signs of core failure, or steel core protrusion between the outer strands.
- Significant corrosion.
- Electric arc (from a source other than power lines) or heat damage.
- Improperly applied end connections.
- Significantly corroded, cracked, bent, or worn end connections (such as from severe service).

If a Category I deficiency is identified, an immediate determination shall be made by the qualified person as to replacement of the wire rope, or if the deficiency is localized, the wire rope may be severed at the bad spot and may be continued to be used.

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# Category II Deficiencies

Visible broken wires as follows:

- In running wire ropes: six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay.
- In rotation resistant ropes: two randomly distributed broken wires in six rope diameters or four randomly distributed broken wires in 30 rope diameters.
- In pendants or standing wire rope more than two broken wires in one rope lay located in rope beyond end connections and / or one or more broken wire in a rope lay located at an end connection.

If a category II deficiency is identified an immediate determination shall be made by the qualified person as to, based on manufacturer recommendations, either remove or monitor the wire rope for continued deterioration.

The qualified person determines when to replace the wire rope (no more than 30 days after the deficiency is identified).

A qualified person assesses the deficiency in light of the load and other conditions of use and determines it is safe for continued use.

A qualified person establishes the parameters of use.

All workers who conduct shift inspections are notified.

The qualified person's findings and procedures are documented.

### Category III Deficiencies

- Electrical contact to power line
- Core protrusion or other distortion indicating core failure in rotation resistant wire rope
- Broken strand

If a category III deficiency is identified, operations involving use of the wire rope shall be prohibited until the:

- Wire rope is replaced (ALWAYS with power line contact).
- Deficiency is localized and problem corrected.

### **Operational Procedures**

Only qualified personnel shall operate cranes and equipment covered by this program. Operators shall comply with the following safety rules while operating cranes and hoists:

- Employees shall not be exposed to unsafe concentrations of toxic gases or oxygen deficient atmospheres when internal combustion engine powered equipment is used. Tests shall be conducted and documented.
- Do not engage in any practice that will divert your attention while operating the crane.
- Respond to signals only from the person who is directing the lift or any appointed signal person.
- Obey a stop signal at all times, no matter who gives it.
- Do not move a load over people.
- People shall not be placed in jeopardy by being under a suspended load.
- Do not work under a suspended load unless the load is supported by blocks, jacks, or a solid footing that will safely support the entire weight.

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- Have a crane or hoist operator remain at the controls or lock open and tag the main electrical disconnect switch.
- Ensure that the rated load capacity of a crane's bridge, individual hoist, or any sling or fitting is not exceeded.
- Know the weight of the object being lifted.
- Check that all controls are in the OFF position before closing the main line disconnect switch.
- If spring-loaded reels are provided to lift pendants clear off the work area, ease the pendant up into the stop to prevent damaging the wire.
- Avoid side pulls. These can cause the hoist rope to slip out of the drum groove, damaging the rope or destabilizing the crane or hoist.
- To prevent shock loading, avoid sudden stops or starts. Shock loading can occur when a suspended load is accelerated or decelerated, and can overload the crane or hoist. When completing an upward or downward motion, ease the load slowly to a stop.

A visual inspection of the equipment will be conducted by a competent person prior to each shift. A competent person must conduct a visual inspection of equipment prior to each shift. The inspection must consist of observation for apparent deficiencies. Some of the inspection items include control mechanisms, pressurized lines, hooks and latches, wire rope, electrical apparatus, tires (when used), and ground conditions. The designated competent person operator shall do the following steps before making lifts with any crane or hoist:

- Test the upper-limit switch and slowly raise the unloaded hook block until the limit switch trips.
- Visually inspect the hook, load lines, trolley, and bridge as much as possible from the operator's station; in most instances, this will be the floor of the building.
- If provided, test the lower-limit switch.
- Test all direction and speed controls for both bridge and trolley travel.
- Test all bridge and trolley limit switches, where provided, if operation will bring the equipment in close proximity to the limit switches
- Test the pendant emergency stop.
- Test the hoist brake to verify there is no drift without a load.
- If provided, test the bridge movement alarm.
- Lock out and tag for repair any crane or hoist that fails any of the above tests.
- Any deficiencies shall be repaired, or defective parts replaced, before continued use.

# Moving a Load

- Center the hook over the load to keep the cables from slipping out of the drum grooves and overlapping, and to prevent the load from swinging when it is lifted.
- Inspect the drum to verify that the cable is in the grooves.
- Use a tag line when loads must traverse long distances or must otherwise be controlled.
- Manila rope may be used for tag lines.
- Plan and check the travel path to avoid personnel and obstructions.
- Lift the load only high enough to clear the tallest obstruction in the travel path.
- Start and stop slowly.
- Land the load when the move is finished.
- Choose a safe landing area.
- Never leave suspended loads unattended

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- In an emergency where the crane or hoist has become inoperative, if a load must be left suspended, barricade and post signs in the surrounding area, under the load, and on all four sides.
- Lock open and tag the crane or hoist's main electrical disconnect switch.

### Parking a Crane or Hoist

- Remove all slings and accessories from the hook.
- Return the rigging device to the designated storage racks.
- Place the emergency stop switch (or push button) in the OFF position.

Cranes or hoists shall not be loaded beyond their rated capacity for normal operations.

Any crane or hoist suspected of having been overloaded shall be removed from service by locking open and tagging the main disconnect switch. Overloaded cranes shall be inspected, repaired, load tested, and approved for use before being returned to service.

# Fall Protection

Anyone conducting non-assembly/disassembly work, maintenance or repair on cranes or hoists at heights greater than 6 ft. (1.8 m) shall use fall protection. Fall protection includes safety harnesses that are fitted with a lifeline and securely attached to a structural member of the crane or building. Anchorages must be any substantial part of the boom or to any substantial piece on the equipment (using correct fall protection equipment). A fall arrest system is permitted to be anchored to the crane/derrick's hook or other part of the load line where the following requirements are met:

- A qualified person has determined the set-up and rated capacity meets or exceeds the anchorage requirements
- The operator is aware it is being used for this purpose

Exceptions to using fall protection involving non-assembly/disassembly work:

- While at a work station or going to and from a work station.
- When walking point to point along a horizontal lattice boom that has been lowered to the ground and supported.
- In the cab or on the deck

Fall protection must be used when working over 15 feet during the assembly/disassembly process, except when the employee is:

- At or near the draw-works
- In the cab, or on the deck

### Signaling

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

- The point of operation is not in full view of the operator
- The view is obstructed when the equipment is traveling

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• The operator or the person handling the load determines it is necessary due to site specific concerns.

Signals to the operator shall be in accordance with the standard hand signals prescribed by the applicable ANSI standard for the type of crane in use unless voice communications equipment (telephone, radio, or equivalent) is used.

- Signalers must be qualified.
- Signals shall be discernible or audible at all times.
- Some special operations may require addition to or modification of the basic signals.
- For all such cases, these special signals shall be agreed upon and thoroughly understood by both the person giving the signals and the operator, and shall not be in conflict with the standard signals.

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#### STANDARD HAND SIGNALS



**STOP** – With arm extended horizontally to the side, palm down, arm is swung back and forth.

RAISE BOOM - With arm

fingers closed.

extended horizontally to the side, thumb points up with other



EMERGENCY STOP – With both arms extended horizontally to the side, palms down, arms are swung back and forth.

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SWING - With ann extended

horizontally, index finger points

in direction that boom is to swing.



HOIST – With upper arm extended to the side, forearm and index finger pointing straight up, hand and finger make small circles.



RETRACT TELESCOPING BOOM – With hands to the front at waist level, thumbs point at each other with other fingers closed.



LOWER – With arm and index finger pointing down, hand and finger make small circles.



RAISE THE BOOM AND LOWER THE LOAD – With arm extended horizontally to the side and thumb pointing up, fingers open and close while load movement is desired.



LOWER BOOM – With ann extended horizontally to the side, thumb points down with other fingers closed.



DOG EVERYTHING - Hands

held together at waist level.

EXTEND TELESCOPING BOOM – With hands to the front at waist level, thumbs point outward with other fingers closed.



TRAVEL/TOWER TRAVEL – With all fingers pointing up, arm is extended horizontally out and back to make a pushing motion in the direction of travel.

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LOWER THE BOOM AND RAISE THE LOAD – With arm extended horizontally to the side and thumb pointing down, fingers open and close while load movement is desired.



CRAWLER CRANE TRAVEL, BOTH TRACKS – Rotate fists around each other in front of body; direction of rotation away from body indicates travel forward; rotation towards body indicates travel backward.



MOVE SLOWLY – A hand is placed in front of the hand that is giving the action signal.



USE MAIN HOIST – A hand taps on top of the head. Then regular signal is given to indicate desired action.



USE AUXILLARY HOIST (whipline) – With arm bent at elbow and forearm vertical, elbow is tapped with other hand. Then regular signal is used to indicate desired action.



CRAWLER CRANE TRAVEL, ONE TRACK – Indicate track to be locked by raising fist on that side. Rotate other fist in front of body in direction that other track is to travel.



TROLLEY TRAVEL – With palm up, fingers closed and thumb pointing in direction of motion, hand is jerked horizontally in direction trolley is to travel.

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# Training

Mandatory training is required for:

- Overhead power lines
- Signal persons
- Competent/qualified persons
- Operators
- Crush/pinch points
- Tag-out

### Administrative Requirements

#### Training Costs

Waco, Inc. must provide all training required under the crane and derrick rules at no cost to the employee. Waco, Inc. must pay for certification or qualification of their currently uncertified or unqualified operators.

### <u>Refresher Training</u>

Waco, Inc. must provide refresher training in relevant topics for each employee when there is an indication that retraining is necessary on the basis of Waco, Inc. actions or an evaluation of the employee's knowledge.

### Training Evaluation

Waco, Inc. must evaluate each employee who has been trained in crane and derrick operations to verify that he or she understands the information provided in training. The rule allows Waco, Inc. to determine the most appropriate method of evaluation.

Note: The crane operator training applies only in states that do not have their own licensing and certification requirements. All other training and qualification requirements apply to all personnel.

### **CRANE OPERATOR TRAINING**

Waco, Inc. must comply with federal requirements to train crane operators employed by them. During the certification phase-in period (i.e., November 2010 to November 2014) in states without operator licensing laws, Waco, Inc. must ensure that crane and derrick operators covered by the rules are competent to operate the equipment safely. Where an employee assigned to operate machinery does not have the required knowledge or ability to operate the equipment safely, Waco, Inc. must train that employee before operating the equipment. Waco, Inc. must ensure that each operator is evaluated to confirm that he or she understands the information provided in the training.

### Operator-in-training requirement effective November 10, 2014

The rules for operator-in-training (e.g., prequalification/certification training, operator's trainer monitoring, multiple-lift rigging operations) in states without operator licensing rules are applicable on November 10, 2014. Until that date, operators must comply with the minimum training requirements required under the transition period from November 8, 2010 to November 10, 2014.

### **Minimum Training Requirements**

Before operating crane equipment, each crane operator must be trained to know how to safely operate the specific type of equipment he or she will operate, including all of the following:

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- Safe practices for testing the boom hoist brake on friction equipment and all other equipment with a boom (see 29 CFR 1926.1430(c)(4)(i) for the specific safe practices);
- The manufacturer's emergency procedures for stopping unintended equipment movement, where available;
- The controls and operational/performance characteristics;
- Use of, and the ability to calculate (manually or with a calculator), load and capacity information on a variety of configurations of the equipment;
- Procedures to prevent and respond to power line contact;
- Technical knowledge similar to the subject matter criteria listed in Appendix C of the regulation applicable to the specific equipment (such as general technical information about wire ropes and rigging devices, site information, operations for carrying loads and multicrane lifts, and use of load charts);
- Technical knowledge applicable to the suitability of the supporting ground and surface to handle expected loads, to site hazards, and to site access;
- The applicable manuals, consensus standards, and other materials incorporated into the regulation.

The operator must be able to read and locate relevant information in the equipment manual and other materials containing information about the safe operation of equipment.

## **Operator Skills Demonstration**

Waco, Inc. must ensure that the operator has demonstrated the skills necessary for safe operation of the equipment, including:

- The ability to recognize, from visual and auditory observation, the items listed in the regulation for shift inspection (29 CFR 1926.1412(d));
- Operational and maneuvering skills;
- Application of load chart information;
- Application of safe shutdown and securing procedures.

## **Overhead Power Line Training**

In cases where crane equipment is expected to come closer to live power lines than the minimum clearance distance permitted under the rules for power line safety Waco, Inc. must train each crane operator and crew member assigned to work with equipment the procedures to be followed in the event of electrical contact with a power line. Such training must include:

- Information regarding the danger of electrocution from the operator simultaneously touching the equipment and the ground.
- The importance to the operator's safety of remaining inside the cab except where there is an imminent danger of fire, explosion, or other emergency that necessitates leaving the cab.
- The safest means of evacuating from equipment that may be energized.
- The danger of the potentially energized zone around the equipment (step potential).
- The need for crew in the area to avoid approaching or touching the equipment and the load.
- Safe clearance distance from power lines.
- Power lines are presumed to be energized unless the utility owner/operator confirms that the power line has been and continues to be deenergized and visibly grounded at the worksite.
- Power lines are presumed to be uninsulated unless the utility owner/operator or a registered engineer who is a qualified person with respect to electrical power transmission and distribution confirms that a line is insulated.

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- The limitations of an insulating link/device, proximity alarm, and range control (and similar) device, if used.
- The procedures to be followed to properly ground equipment and the limitations of grounding.

Employees working as dedicated spotters must be trained to enable them to effectively perform their task, including training on the applicable requirements of this section.

## Tag Out and Start-up Procedures Training

Each operator must be trained in the tagout and start-up procedures specified in the rule for crane and derrick equipment that is out of service (see Operation rule at 29 CFR 1926.1417(f) and (g)).

# Operators of Derricks, Sideboom Cranes and equipment with a maximum manufacturer-rated hoisting/lifting capacity of 2,000 lb. or less

Such operators are exempt from the detailed training requirements for other cranes. However, before operating such equipment, they must be trained in the safe operation of the type of equipment they will be operating.

## ASSEMBLY/DISASSEMBLY (A/D) DIRECTOR

The A/D director is a person who supervises equipment assembly and disassembly operations and must understand the applicable A/D procedures.

The A/D director must meet the criteria for a competent and qualified person under the following conditions:

- Where the assembly and disassembly is performed by only one person, that person is considered the A/D director and must meet the training criteria for both a competent person and a qualified person;
- Where the A/D director is assisted by one or more qualified persons, he or she must meet the criteria for a competent person and is not required to be a qualified person.

## AUTHORIZED PERSONNEL TRAINING

Each employee assigned to work on or near the equipment (i.e., authorized personnel) must be trained to:

- Recognize swing radius hazards;
- Recognize struck-by and pinch/crush hazard areas posed by the rotating superstructure;
- Keep clear of holes and crush/pinch points.

## COMPETENT PERSON TRAINING

The competent person (i.e., one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them) must be trained in any additional requirements of his or her role and responsibility under the new rules. For example, a competent person assigned to conduct a visual inspection of equipment during each shift the equipment is used must be trained in the required elements of a shift inspection.

## CREW MEMBER TRAINING

## Assembly and Disassembly Operations

Before commencing assembly/disassembly operations, the A/D director must ensure that the crew members understand:

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- Their tasks and the hazards associated with their tasks;
- The hazardous positions and locations that they need to avoid.

## Work Near Power Lines and Power Line Safety

Crew members assigned to work with crane and derrick equipment must receive the same overhead power line training as required for crane operators, regardless of the distance from the power lines. See the Crane Operator Training subsection for more information.

## DEDICATED SPOTTER

The dedicated spotter must meet the qualifications for a signal person and complete the training requirements for crew member.

The dedicated spotter's sole responsibility is to watch the separation between power lines and the crane or derrick equipment, load line and load (including rigging and lifting accessories) and ensure through communication with the operator that the applicable minimum approach distance is not breached.

## MAINTENANCE AND REPAIR EMPLOYEE QUALIFICATIONS AND TRAINING

Maintenance and repair personnel must be trained to operate the equipment under limited conditions necessary to perform the maintenance or repair. The operation is limited to those functions necessary to perform maintenance, inspect the equipment or verify its performance. Such personnel may operate the equipment under the direct supervision of a qualified or certified crane operator, or if they are familiar with the operation, limitations, characteristics, and hazards associated with the type of equipment.

## **Qualified Person**

A maintenance and repair employee must be a qualified person (i.e., a person who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project). Maintenance and repair workers are not considered "operators" and are therefore not required to be trained in all of the areas required for crane operators.

## Tagout and Start-up Procedures Training

Each maintenance and repair person must be trained in tagout and start-up procedures specified in the rule (see Operation rule at 29 CFR 1926.1417(f) and 29 CFR 1926.1417(g)).

## QUALIFIED PERSON

Qualified person is an employee by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, successfully demonstrates the ability to solve/resolve problems relating to the subject matter, the work, or the project. Riggers and signalers are examples of personnel that must meet the requirements for qualified person.

Waco, Inc. must train each qualified person regarding the requirements of the crane and derrick regulations applicable to their respective roles.

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## FALL PROTECTION TRAINING

Waco, Inc. must train each employee who may be exposed to fall hazards while on or hoisted by crane equipment on all of the fall protection requirements in the rule (29 CFR 1926.1423(a) to 1926.1423(j)), and the applicable criteria and practices in the fall protection rule for construction at 29 CFR 1926.502.

## TRAINING RECAP TABLE

Personnel	Activity or Equipment	Training Requirement
All personnel	Work with cranes and derricks	Hazards and procedures to keep clear of holes and crush/pinch points
All personnel	Exposed to fall hazards while on or hoisted by equipment	Fall protection
All personnel on floating	Floating cranes/derricks and	Understand hazard warning signs and
cranes/cranes on barges	cranes/derricks on barges	markings
Assembly/Disassembly (A/D) Director	Supervise assembly and disassembly operations	Meet criteria of a competent person and qualified person
Authorized personnel	Work in areas near rotating crane/derrick superstructure	How to recognize struck-by and pinch/crush hazards
Competent Person	All, including shift and monthly inspections	Applicable to respective role
Crew member	Assembly and disassembly operations	Understand tasks, hazards, positions/ areas to avoid
Crew member	Work near power lines	Power line safety information and procedures
Dedicated Spotter	Work near power lines	Qualify as a signal person
Dedicated Spotter	Work near power lines	Power line safety information and procedures
Maintenance and Repair Personnel	Operate equipment	Qualify to operate
Maintenance and Repair Personnel	Equipment out of service	Tagout and start-up procedures
Operator	Derricks, sidebooms, small hoist/lift capacity cranes (2,000 lbs. or less) only	Know how to safely operate equipment (no specific training requirements)
Operator	Friction equipment	Test the boom hoist brake
Operator	Unintended equipment movement	Know manufacturer's emergency procedures
Operator	Operate specific type of crane (other than derricks, sidebooms, cranes of 2,000 lb. or less capacity)	Know how to safely operate, inspect, calculate load, shut down, and secure
Operator	Work near power lines, and within minimum power line clearance	Power line safety and procedures in the event of electrical contact
Operator	Crane/Derrick equipment out of service	Tagout and start-up procedures
Qualified Person	All, including annual inspections	Applicable to respective role; possess a recognized degree, certificate, or professional standing, or have extensive knowledge, training, and experience.
Rigger	Assemble, rig, disassemble equipment	Same as for qualified person

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Personnel	Activity or Equipment	Training Requirement	
	and materials		
Signal Person	Communicate with operator of crane/derrick with greater than 2,000 lb. lift capacity	Qualify as a signal person with written or verbal test, retrain if needed	
Signal Person	Communicate with operator of crane/derrick with lift capacity of 2,000 lb. or less	Proper use of signals applicable to the use of the equipment	

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## **CRANES AND DERRICKS IN CONSTRUCTION** PRE-SHIFT INSPECTION BY A COMPETENT PERSON 29 CFR 1926.1412-1413

CRANE: \_\_\_\_\_\_ DATE: \_\_\_\_\_ INSPECTOR: \_\_\_\_\_

Check the box next to each item after it has passed inspection. Note any deficiencies or other observations that could pose a risk of injury or property damage.

EQUIPMENT TYPE: \_\_\_\_\_\_ EQUIPMENT MODEL: \_\_\_\_\_

MANUFACTURER: \_\_\_\_\_\_ SERIAL NUMBER: \_\_\_\_\_\_

Circl	e One	Item or Function Inspected	Notes
Yes	No	Control mechanisms for maladjustments interfering with proper operation	
Yes	No	Control and drive mechanisms for apparent excessive wear of components and contamination by lubricants, water or other foreign matter	
Yes	No	Air, hydraulic, and other pressurized lines for deterioration or leakage, particularly those which flex in normal operation	
Yes	No	Hydraulic system for proper fluid level	
Yes	No	Hooks and latches for deformation, cracks, excessive wear, or damage such as from chemicals or heat	
Yes	No	Wire rope reeving for compliance with the manufacturer's specifications	
		Wire Rope Category I	
Yes	No	Significant distortion of the wire rope structure such as kinking, crushing, unstranding, birdcaging, signs of core failure or steel core protrusion between the outer strands	
Yes	No	Significant corrosion	
Yes	No	Electric arc damage (from a source other than power lines) or heat damage	
Yes	No	Improperly applied end connections	
Yes	No	Significantly corroded, cracked, bent, or worn end connections (such as from severe service).	
		Wire Rope Category II	
Yes	No	Visible broken wires, as follows:	
Yes	No	In running wire ropes: Six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay, where a rope lay is the length along the rope in which one strand makes a complete revolution around the rope.	
Yes	No	In rotation resistant ropes: Two randomly distributed broken wires	

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Circl	e One	Item or Function Inspected	Notes
		in six rope diameters or four randomly distributed broken wires in 30 rope diameters.	
Yes	No	In pendants or standing wire ropes: More than two broken wires in one rope lay located in rope beyond end connections and/or more than one broken wire in a rope lay located at an end connection	
Yes	No	A diameter reduction of more than 5% from nominal diameter.	
		Wire Rope Category III	
Yes	No	In rotation resistant wire rope, core protrusion or other distortion indicating core failure.	
Yes	No	Prior electrical contact with a power line.	
Yes	No	A broken strand.	
		Wire Rope Critical Review Items	
Yes	No	The competent person must give particular attention to all of the following:	
Yes	No	Rotation resistant wire rope in use	
Yes	No	Wire rope being used for boom hoists and luffing hoists, particularly at reverse bends.	
Yes	No	Wire rope at flange points, crossover points and repetitive pickup points on drums.	
Yes	No	Wire rope at or near terminal ends.	
Yes	No	Wire rope in contact with saddles, equalizer sheaves or other sheaves where rope travel is limited.	
Yes	No	Electrical apparatus for malfunctioning, signs of apparent excessive deterioration, dirt or moisture accumulation	
Yes	No	Tires (when in use) for proper inflation and condition	
Yes	No	Ground conditions around the equipment for proper support, including ground settling under and around outriggers/stabilizers and supporting foundations, ground water accumulation, or similar conditions	
Yes	No	The equipment for level position within the tolerances specified by the equipment manufacturer's recommendations, both before each shift and after each move and setup.	
Yes	No	Operator cab windows for significant cracks, breaks, or other deficiencies that would hamper the operator's view.	
Yes	No	Rails, rail stops, rail clamps and supporting surfaces when the equipment has rail traveling.	
Yes	No	Safety devices and operational aids for proper operation	

SIGNATURE OF INSPECTOR \_\_\_\_\_\_ DATE \_\_\_\_\_

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# **COVID-19 Safety Policy**

# Date: 04/14/2020

## Purpose

Ensuring the health and safety of all of our clients, employees, contractors and visitors is our most important responsibility. As we continue to monitor the impacts of COVID-19 closely, we are following federal, state/provincial and municipal directives and recommendations.

We need to consider how best to decrease the spread of COVID-19 and lower the impact in our workplace and those of our customers. This includes activities in one or more of the following areas:

- reduce transmission among employees,
- maintain healthy business operations, and
- maintain a healthy work environment.

## PREVENTION AND PRECAUTIONS WE HAVE TAKEN THUS FAR FOR OUR COMPANY

- Canceled all non-essential travel.
- We encourage staff to telework, particularly individuals at increased risk of severe illness.
- Conducting all meetings via conference calls or video conference when possible. Do not convene meetings of more than 10 people (or less depending on local health regulations).
- Implementing various levels of social distancing (6 feet or 2 meters) measures including limiting in-person meetings, lunchroom seating all based on local governmental regulations.
- Restricted access to our worksite if the individual has traveled internationally in the past 14 days.
- Prompt identification and isolation of potentially infectious individuals is a critical step in protecting workers, customers, visitors, and others. We mandate self-isolation for any symptomatic personnel.
- Employees who have <u>signs and symptoms per CDC</u> (fever, cough, or shortness of breath) should notify their supervisor and stay home.
- If an employee is confirmed to have COVID-19 infection, we will inform fellow employees (and clients if the employee worked at their site) of their possible exposure to COVID-19 in the workplace but maintain confidentiality as required by law. The fellow

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employees should then self-monitor for symptoms (i.e., fever, cough, or shortness of breath).

- Ensured hand hygiene supplies are readily available in our workplace.
- Increased frequency of cleaning with disinfectants recommended for coronavirus.
- Require frequent and thorough handwashing, sanitizing, as well as coughing and sneezing etiquette.
- Where required additional PPE will be issued at no charge based on the hazard.

## EMPLOYEE EDUCATION

- Wash your hands often with soap and water for at least 20 seconds. Use hand sanitizer with at least 70% alcohol if soap and water are not available. Always wash hands when they are visibly soiled and after removing any PPE.
- Avoid touching your eyes, nose, and mouth with unwashed hands.
- All employees should bring foods and beverages from home when possible. Do not share water bottles.
- When entering a machine or vehicle that you are not sure you were the last person to enter, wipe down the exterior and interior and door handles, steering wheel and gear shifter with disinfectant wipes
- Cover your mouth and nose with a tissue when you cough or sneeze or use the inside of your elbow. Throw used tissues in the trash and immediately wash hands with soap and water for at least 20 seconds. If soap and water are not available, use hand sanitizer containing at least 70% alcohol.
- Clean AND disinfect frequently touched objects and surfaces such as workstations, keyboards, telephones, handrails, and doorknobs. Dirty surfaces can be cleaned with soap and water prior to disinfection. To disinfect, use products that meet criteria for use against COVID-19, and are appropriate for the surface.
- Avoid using other employees' phones, desks, offices, or other work tools and equipment, when possible. If necessary, clean and disinfect them before and after use.
- Practice social distancing by avoiding large gatherings and maintaining distance (approximately 6 feet or 2 meters) from others when possible.

## COMMUNICATIONS

As the COVID-19 situation develops we will supply updated information and/or requirements to our employees, contractors, supplier, visitors and customers as required.

# PRECAUTIONS WE ASK OF CONTRACTORS, SUPPLIERS OR VISITORS

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- We require that any contractor, supplier or visitor comply with federal, provincial and municipal guidelines and postpone any plans to visit our facility if within the last 14 days they have:
  - o been diagnosed with COVID-19.
  - o traveled internationally in the past 14 days.
  - o been exposed to an individual diagnosed with COVID-19.
  - have had close contact with a person suspected of direct exposure to COVID-19.

# PRECAUTIONS WE TAKE FOR OUR CLIENTS

- Maintain communications with our clients for workforce readiness and availability and share our client's precautionary measures for COVID-19 with our employees before they report to the client.
- Deny access to any client location if any employee has traveled internationally in the past 14 days.
- Deny access to any client if an employee has been diagnosed with COVID-19.
- Deny access to any client location if any employee shows symptomatic signs fever, cough or shortness of breath) or have had close contact with a person suspected of direct exposure to COVID-19.
- We will strictly follow our client requirements for entry on their property to perform work.
- No formerly denied access employee will be allowed to return to work until cleared based on local law or regulation.

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## Purpose

The purpose of this program is to establish a firm but fair disciplinary action policy to enforce the safety system.

## Scope

This document is applicable to all employees.

## Responsibilities

It is the responsibility of each and every person employed by Waco, Inc. to work in a safe and efficient manner. The safety system provides guidelines and procedures to help ensure that safe work practices are observed. In the event that any employee violates provisions of the Waco, Inc. safety system or works in a manner that threatens his own health and safety or the health and safety of the employees around him, he will be subject to disciplinary action, up to and including termination of employment.

The safety manager, operations managers, supervisors and foremen hold positions responsible for enforcing the safety system and for issuing disciplinary action as required by this section of the safety manual.

Waco, Inc. is committed to safety and senior management holds all supervisory staff responsible and accountable for safety within their respective areas.

Physical inspections by Waco, Inc. officials or insurance representatives that indicate violations showing overall lack of commitment to Waco, Inc. safety goals shall be under the same level of disciplinary actions.

## Requirements

Safety is a core value and a condition of employment at Waco, Inc. The following actions constitute a safety violation:

- Not following verbal or written safety procedures, guideline or rules of Waco, Inc. or our clients
- Horse play, failure to wear required PPE, and or abuse of PPE
- Being under the influence of drugs or alcohol during work
- Bringing weapons on the job site
- Failure to report incidents or injuries
- Attempted or actual physical force to cause injury, threatening statements or other actions to cause an employee to feel they are at risk of injury.

## Procedure

The following procedures will be following after issuing a safety violation notice:

• The first offense will result in a verbal warning. The employee will be met with and informed that he or she is being issued a verbal warning and informed of the infraction, rule or procedure that was violated and the corrective action to be taken. Proper procedure will be discussed to clarify the situation and allow the employee to correct his behavior. The person making this verbal warning will inform the operations

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manager of his branch that this warning has been issued so the operations manager may make a written record of the warning.

- The second offense will result in a written reprimand and additional training. The reprimand will be written on the standard Safety Reprimand form (see below) and will describe the unsafe activity or behavior that needs correction. Refer to the section of the safety program that was violated (when applicable). The employee receiving the reprimand has the right to submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become a part of the employee's employment records.
- The third offense will result in another written reprimand (using the standard form) and punitive layoff, the duration of which will be decided at the time of the disciplinary action and is to be weighed by the severity of the offense. Again, the employee may submit a written rebuttal to the reprimand. The employee must sign the reprimand. The reprimand and any rebuttal will become a part of the employee's employment records.
- The fourth offense may result in the termination of the offending employee.

The above actions are to be placed against a sliding twelve month scale. If an employee receives a reprimand on January 1 and commits his fourth offense on or before December 31st of the same year, he is terminated. The employee does not have to commit the same violation each time to receive further reprimands. He could receive a verbal reprimand for smoking in a no smoking area on his first offense and get a written reprimand for his second offense which might be a forklift violation and yet another for failing to use proper personal protective equipment. He will be terminated upon his fourth offense in the last twelve months.

In the case of serious safety violations such as by-passing guarding or other unsafe activities that put the violator or other employees at serious risk of injury, the manager may move the violator directly to the second or third warning level. If the violator's actions put him or others at risk of death or dismemberment the manager has the option to terminate him with no further warning.

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# Safety Reprimand Form

Date:	 Reprimand #
Issued To:	 -
Signature:	 -
Issued By:	 -
Signature:	 -

Violation (Describe in Detail):

Follow up Training:		 	
Presented by:	<u> </u>	 	
Date of Training:		 	
Trainee Signature:		 	

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## Purpose

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

## **Key Responsibilities**

## Waco, Inc. Safety Manager

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

#### Site Manager

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

#### Employees

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

## Vehicle and Transportation Related

## Driving Safety

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

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

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

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

No passengers shall be on trucks used to deliver goods.

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

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

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

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

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

Employees driving vehicles are required to follow safe driving practices:

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

## Drivers are to be prepared before leaving:

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

## Vehicle Requirements

- All vehicles shall be fit for the purpose, and shall be maintained in safe working order.
- No vehicle less than 1000 kg is to be used on public roads.

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- Tires, including spares if full size, are to be of same type, profile and tread pattern, except when the vehicle or tire Manufacturer recommends a different type for certain axles.
- Tire type and pattern is to be recommended by the vehicle or tire manufacturer for use on the vehicle in the area of operation.
- Vehicles are to be fitted with a spare wheel and changing equipment to safely change a wheel, or a suitable alternative.
- Vehicles longer than 6 meters/20 feet or with restricted rear view (i.e. pickup trucks that are fully loaded) are to be fitted with an audible reversing alarm.
- All seats are to be fitted with headrests
- All light duty vehicles (including buses) are to be equipped with an adjustable left, right and central rear view mirrors
- Loads shall be secure and shall not exceed the manufacturer's specifications and legal limits for the vehicle.
- All vehicles are to be equipped with a multipurpose fire extinguisher with a capacity of at least 0.9 kg/2 lb. The fire extinguisher shall be securely mounted on a bracket and located so that it is easily accessible in an emergency without becoming a hazard in case of an incident.
- All light vehicles shall be equipped with a securely stowed first aid kit.
- All drivers of light vehicles shall carry a high visibility jacket for use in case of emergency stops.
- All light duty vehicles carry a minimum of one collapsible hazard warning triangle.
- Rollover protection will be installed in any vehicle to address high risk environments. The rollover protection engineered will conform to recognized regulatory standard and industry preferred practices.
- All light equipment vehicles shall be outfitted with two red high-intensity lights located as high, as far apart, and as far back as practical, wired to the headlight switch, but also with an override switch, if permitted by local regulations.

## Transportation

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

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

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

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

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

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

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

• effective ventilation, independent of doors, providing clean air,

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- adequate lighting and means for heating and cooling,
- an effective means of communication between the operator and passengers, and
- more than one means of exit.

## **Traffic Control**

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

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

## **ATV Vehicles**

If a Waco, Inc. work site utilizes ATV vehicles then the following shall apply:

- If the manufacturer has not set limits for operation of the ATV on sloping ground, 5% is the maximum allowable slope unless Waco, Inc. has developed and implemented written safe work procedures appropriate for any steeper slope on which the equipment is to be used.
- Waco, Inc. must ensure that each ATV operator is properly licensed and trained in the safe operation of the vehicle. The training program for an ATV operator must cover:
  - the operator's pre-trip inspection,
  - use of personal protective apparel,
  - o operating skills according to the ATV manufacturer's instructions,
  - o basic mechanical requirements, and
  - o loading and unloading the vehicle, if this is a job requirement.
- An ATV operator and any passenger on an ATV must wear approved eye and hearing protection as required by local regulatory requirements and the Waco, Inc. PPE Program. An ATV operator and any passenger on an ATV must wear clothing suitable for the environmental conditions and when necessary to

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protect against the hazards presented at the worksite, suitable gloves and clothing which covers the ankles and legs and the arms to the wrists and appropriate footwear.

- Waco, Inc. requires that approved helmets shall be worn by the operator and passenger.
- Loading and unloading of an ATV onto or off a carrier vehicle must be done in a safe manner. If ramps are used when loading or unloading an ATV they must be placed at a suitable angle, be sufficiently wide and have a surface finish which provides an adequate grip for the ATV's tires.

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## Purpose

The purpose of the Electrical Safety program is to set forth procedures for the safe use of electrical equipment, tools, and appliances at Waco, Inc.

## Scope

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

## Definitions

Affected Personnel - Personnel who normally use and work with electrical equipment, tools, and appliances, but who do not make repairs or perform lock out/tag out procedures.

Appliances - Electrical devices not normally associated with commercial or industrial equipment such as air conditioners, computers, printers, copiers, coffee pots, microwave ovens, toasters, etc.

Circuit Breaker - A device designed to open and close a circuit by non-automatic means and to open the circuit automatically on a predetermined over current without injury to itself when properly applied within its rating.

Disconnecting Means - A device, or group of devices, or other means by which the conductors of a circuit can be disconnected from their source of supply.

Disconnecting Switch - A mechanical switching device used for isolating a circuit or equipment from a source of power.

Double Insulated Tool - Tools designed of non-conductive materials that do not require a grounded, three wire plug.

Ground - Connected to earth or some conducting body that serves in place of the earth.

Grounded Conductor - A conductor used to connect equipment or the grounded circuit of a wiring system to a grounding electrode or electrodes.

Ground Fault Circuit Interrupter (GFCI) - A device whose function is to interrupt the electric circuit to the load when a fault current to ground exceeds some predetermined value that is less than that required to operate the over current protective device of the supply circuit. <u>Waco, Inc. shall use GFCIs in lieu of an assured grounding program</u>.

Insulated - A conductor encased within material of composition and thickness that is recognized as electrical insulation.

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Premises Wiring - That interior and exterior wiring, including power, lighting, control, and signal circuit wiring together with all of its associated hardware, fittings, and wiring devices, both permanently and temporarily installed, which extends from the load end of the service drop, or load end of the service lateral conductors to the outlet (s). Such wiring does not include wiring internal to appliances, fixtures, motors, controllers, motor control centers, and similar equipment.

Qualified Person - One that has been trained in the repair, construction and operation of electrical equipment and the hazards involved.

Strain Relief - A mechanical device that prevents force from being transmitted to the connections or terminals of a cable or extension cord.

Class I Locations - Are those in which flammable gases or vapors are or may be present in the air in quantities sufficient to produce explosive or ignitable mixtures.

Class 1 Division 1 - Is a location (a) in which hazardous concentrations of flammable gases or vapors may exist under normal operating conditions; or (b) in which hazardous concentrations of such gases or vapors may exist frequently because of repairs or maintenance operations or because of leakage; or (c) in which a breakdown or faulty operation or equipment or processes might release hazardous concentrations of flammable gases or vapors, and might also cause simultaneous failure of electrical equipment.

Class 1 Division 2 - Is a location (a) in which volatile flammable liquids or flammable gases are handled, processed, or used, but in which the hazardous liquid, vapors, or gases will normally be confined within closed containers or closed systems from which they can escape only in case of accidental rupture or breakdown of such containers or systems, or in of abnormal operation of equipment or (b) in which hazardous concentrations of gases or vapors are normally prevented by positive mechanical ventilation, and which might become hazardous through failure or abnormal operations of the ventilating equipment; or (c) that is adjacent to a Class 1, Division 1 location, and to which hazardous concentrations of gases or vapors might occasionally be communicated unless such communication is prevented by adequate positive-pressure ventilation from a source of clean air, and effective safeguards against ventilation failure are provided.

Class II locations - Class II locations are those that are hazardous because of the presence of combustible dust. Class II locations include the following:

Class II, Division 1 - A Class II, Division 1 location is a location (a) in which combustible dust is or may be in suspension in the air under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures; or (b) where mechanical failure or abnormal operation of machinery or equipment might cause such explosive or ignitable mixtures to be produced, and might also provide a source of ignition through simultaneous failure of electric equipment, operation of protection devices, or from other causes, or (c) in which combustible dusts of an electrically conductive nature may be present.

*NOTE*: This classification may include areas of, areas where metal dusts and powders are produced or processed, and other similar locations that contain dust producing machinery and equipment (except where the equipment is dust-tight or vented to the outside).

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- These areas would have combustible dust in the air, under normal operating conditions, in quantities sufficient to produce explosive or ignitable mixtures.
- Combustible dusts that are electrically nonconductive include dusts produced in the handling and processing produce combustible dusts when processed or handled.
- Dusts containing magnesium or aluminum are particularly hazardous and the use of extreme caution is necessary to avoid ignition and explosion.

Class II, Division 2 - A Class II, Division 2 location is a location in which: (a) combustible dust will not normally be in suspension in the air in quantities sufficient to produce explosive or ignitable mixtures, and dust accumulations are normally insufficient to interfere with the normal operation of electrical equipment or other apparatus; or (b) dust may be in suspension in the air as a result of infrequent malfunctioning of handling or processing equipment, and dust accumulations resulting there from may be ignitable by abnormal operation or failure of electrical equipment or other apparatus.

*NOTE*: This classification includes locations where dangerous concentrations of suspended dust would not be likely but where dust accumulations might form on or in the vicinity of electric equipment. These areas may contain equipment from which appreciable quantities of dust would escape under abnormal operating conditions or be adjacent to a Class II Division 1 location, as described above, into which an explosive or ignitable concentration of dust may be put into suspension under abnormal operating conditions.

## Responsibilities

## Managers/Supervisor

The HSE Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees shall be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

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## Safe Work Practices

## Inspections

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.
- Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.

## Repairs

- Only Qualified Personnel, who have been authorized by the department supervisor or manager, may make repairs to supply cords on electrical tools and to extension cords.
- The names of employees authorized to make repairs will be posted in the workplace.
- Only certified electricians shall be allowed to make repairs to electrical equipment and wiring systems.
- The supervisor obtaining the services of a certified electrician is responsible to verify the electrician's credentials.
- Employees shall not enter spaces containing exposed energized parts unless qualified and proper illumination exists to enable employees to work safely.
- Employees shall not wear conductive apparel such as rings, watches, jewelry, etc. (unless they are rendered non-conductive by covering, wrapping, or other insulating means) while working on or near open energized equipment this includes batteries on trucks, forklifts, phone backup systems or other such equipment.
- If employees are subject to handle long dimensional conductor objects (ducts or pipes), steps for safe work practices shall be employed to ensure the safety of workers.

## Extension Cords

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
  - All extension cords shall be plugged into one of the following:

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- A GFCI outlet;
- A GFCI built into the cord;
- A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be remove from service and repaired or replaced.
- Extension cords shall not be used on compressor skid to operated heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment shall be hard wired per applicable electrical codes.

## Outlets

• Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

## **Multiple Outlet Boxes**

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

## **Double Insulated Tools**

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

## Switches, circuit breakers, and disconnects

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labeled with the voltage rating.
- Each breaker within a breaker panel must be labeled for the service it provides.
- Disconnect switches providing power for individual equipment must be labeled accordingly.

## Ladders

- Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.
- Wood ladders should not be painted, which can hide defects, except with clear lacquer.
- When using ladders they shall be free from any moisture, oils, and greases.

## **Energized and Overhead High Voltage Power Lines & Equipment**

- A minimum clearance of 10 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines shall be de-energized and grounded or other protective measures shall be provided before work is started.
- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.

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 Minimum approach distance for qualified employees shall be followed per 29 CFR 1910.333(c)(3)(i) Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current). Approach distances are 10' for 50kV plus 4" for every additional 10kV.

## Confined or Enclosed Work Spaces

- When an employee works in a confined or enclosed space that contains exposed energized parts, the employee shall isolate the energy source and turn off the source and lock and tag out the energy source (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

## **Enclosures, Breaker Panels, and Distribution Rooms**

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures shall be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have "Danger: High Voltage Authorized Personnel Only" posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

## Lock Out/Tag Out

- No work shall be performed on (or near enough to them for employees to be exposed due to the dangers
  of tools or other equipment coming into contact with the live parts) live parts and the hazards they
  present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out shall be treated as live parts.
- Per Waco, Inc. policy all electrical will be outsourced and performed only by qualified and licensed electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools. Any equipment being made ready for maintenance will be locked out using Waco, Inc.'s Control of Hazardous Energy Lock Out/Tag Out Program. Lockouts are performed by the HSE Manager, Shop Foreman or Branch Manager. Designated employees in some branches may be trained by local management to lock out equipment. If live sources are to be worked it will only be performed with the knowledge of local management. Only certified electricians may work on electric circuit parts or equipment.
- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow Waco, Inc.'s Control of Hazardous Energy Lock out/Tag Out Program.
- Authorized personnel will be trained in lock out/tag out procedures.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

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## Contractors

- Only approved, certified, electrical contractors may perform construction and service work on Waco, Inc. or client property.
- It is the Manager/Supervisors responsibility to verify the contractor's certification.

## Fire Extinguishers

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

## Electric Shock-CPR

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

## **Electric Welders**

- A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.
- A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

## **Equipment Grounding**

- All gas compressors, air compressors, separators, vessels, etc. shall be grounded by means of using a lug and ground strap, nominal in size to a ½" bolt or larger, attached to a ground rod six feet or longer.
- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

## Assured Grounding

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

• Waco, Inc. shall use GFCI's in lieu of an assured grounding program.

## **Ground Fault Circuit Interrupters**

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

• All hand portable electric tools and extension cords shall use a GFCI.

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

## Training

All regular full time and temporary employees will be trained in electrical safety utilizing the Waco, Inc. Electrical Safety Training course or an approved equivalent.

Employees who face a risk of electric shock, but who are not qualified persons, shall be trained and familiar with electrically related safety practices.

Employee shall be trained in safety related work practices that pertain to their respective job assignments.

Employees shall be trained on clearance distances.

Safe work practices shall be employed to prevent electric shock or other injuries resulting for either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

Qualified employees must adhere to the approach distances in Table S5 of CFR 1910.333 (below). Waco, Inc. only has unqualified employees.

Voltage Rage (phase to phase)	Minimum Approach Distance
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm).
Over 750V, not over 2kV	1 ft. 6 in. (46 cm).
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm).
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm).
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm).
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm).
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm).

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## Purpose

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

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

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

## **Emergency Response Planning, Issuing and Annual Review Guidelines**

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

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

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

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

## **Reviewing the Emergency Action Plan with Employees**

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

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

## **Procedures for Emergency Evacuation Planning**

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

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

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

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

## List of Potential Emergencies

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

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

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

## Guidance Procedures for Potential Emergencies

## <u>Fire</u>

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

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

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

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

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

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## Bomb Threats

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

## Medical Emergencies

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

## **Explosions**

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

## Workplace Violence

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

## **Emergency Response Equipment**

## Listing of Types of Emergency Equipment

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

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

## Inspection & Maintenance Records

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

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

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

## Media Response Plan

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

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

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

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

## Training

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

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

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- Employees expected to perform duties under the Emergency Action Plan will be trained prior to assuming their roles. This will include simulated rescue or evacuation exercises and regular retraining, appropriate to the type of rescue or evacuation being provided, and training records must be kept.
- A list of trained staff responders shall be posted and maintained indicating their name, response function, their work location and what type of equipment they have been trained for.

## Location and Use of Emergency Facilities

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

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

## Fire Protection & Response

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

## Protection

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

## Response

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

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

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

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## Alarm & Emergency Communication

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

## Alarm System

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

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

## Communications

Waco, Inc. responders and security use telephones, cell phones and radios in conjunction with emergency response.

## **Rescue and Evacuation Procedures**

## **Procedures for Rescue and Medical Services**

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

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

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

#### Procedure for Evacuation

#### Preparation for Evacuation

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

The Waco, Inc. designated Emergency Coordinator will maintain an active list of all Waco, Inc. and contract emergency responders.

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## Critical Plant Operations Personnel

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

## Evacuation Drills

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

## Coordination Within a Facility

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

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

## Procedures to Account for All Employees After Evacuation

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

## **Emergency Evacuation Notification and Routes**

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

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

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

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

## Sweep Check by Waco, Inc. Designated Responders

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

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

## Evacuation or Drill Evaluation

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

## **Emergency Response Program Management**

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

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

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

## <u>Duties</u>

## Waco, Inc. Emergency Coordinator

The Waco, Inc. Emergency Coordinator ensures that:

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

During an evacuation or evacuation exercise, the Waco, Inc. Emergency Coordinator:

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

Following an evacuation or evacuation exercise, the Waco, Inc. Emergency Coordinator:

- Notifies Fire Wardens that it is safe to re-enter the building.
- Prepares a report following an evacuation (actual or drill).

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• Reports to management for follow up or corrective actions.

## Waco, Inc. Site Safety Supervisor

• Assist the Waco, Inc. Emergency Coordinator when requested.

## Fire Wardens

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

## **Residents, Contractors & Visitors**

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

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# Waco, Inc. Emergency Inspection Checklist

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

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

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

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

Date of last inspection of sprinkler system (required yearly)

Comment/Actions:

	<b>N</b> /			EAP
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# Waco, Inc. Evacuation Report

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

Building Details			
Building Name Designated Muster Station			
Evacuation Details			
Evacuation Date/Time:/ Trigger for Evacuation: Fire Alarm Activated Emergency Situation:	Drill ERT Security		No 🗆
Condition: Staff Only All Occupants Number of Evacuees Elaps			er
Evacuation was orderly with no panic Mobility-impaired persons present (sight, hearing The majority of evacuees went to the mustering p Were the building occupants notified of this drill? Emergency Control Organization	g, physical, etc.)? points?	Yes Yes Yes Yes Yes	No
Emergency Coordinator Depu	uty Emergency Coordinator		
Emergency Coordinators were stationed at the proper emergency control point? All Fire Wardens reported to the Emergency Coordinator? If not, who did not report in? All Fire Wardens were identifiable (vests, hard hats, flash lights)? Control of external building exits achieved? Did the Fire Wardens perform their duties correctly? Evacuation maps and emergency procedures posters are up-to-date? Building Fire & Emergency Equipment			No    No    No    No    No    No
building File & Emergency Equipment			
Was the evacuation signal audible throughout the Automatic closing fire doors closed when the fire Card access doors automatically released when the Fire doors and emergency exits unobstructed?	Yes Yes Yes Yes Yes	No	

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## **Emergency Response Members**

Client:	Maintenan	ce 🗆	Security [	🗌 Waco, Inc. Er	nergency Coc	ordinator 🗆	hse 🗆
Emergency Respo	onse Team	Fire Br	igade 🗆	Ambulance 🗆	Police	Other:	

## Waco, Inc. Action Sheet

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

## Records

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

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## **Emergency Action Plan Orientation Check List**

Employee Name \_\_\_\_\_

Hire/Transfer Date \_\_\_\_\_

Department \_\_\_\_\_\_
Orientation Date \_\_\_\_\_

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

Employee Signature: \_\_\_\_\_

Orientation Conducted by: \_\_\_\_\_

Job Position/Title: \_\_\_\_\_\_

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## Sample Emergency Action Plan Core Requirements

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

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FIRE PROTECTION REQUIREMENTS	List all site fire protection requirements.
ALARM AND EMERGENCY COMMUNICATION REQUIREMENTS	<ul> <li>Pulling the fire alarm automatically alerts the fire department and initiates an alarm within the building</li> <li>The fire alarm signal is (describe sound and pattern)</li> </ul>
	First aid supplies are located at: <ul> <li>List</li> </ul>
FIRST AID	<ul> <li>First Aiders are:</li> <li>List all names</li> <li>Transportation for ill or injured workers is by (describe). The contact</li> </ul>
	number or radio channel is (describe). In case of fire:
PROCEDURES FOR RESCUE AND EVACUATION	<ul> <li>Advise all personnel</li> <li>Pull the fire alarm</li> <li>Evacuate all persons to a safe point in the staff parking lot and account for everyone including visitors and clients</li> <li>Assist ill or injured workers to evacuate the building</li> <li>Provide first aid to injured workers if required</li> <li>Call emergency response personnel to arrange for transportation of ill or injured workers to the nearest health care facility if required.</li> </ul>
DESIGNATED RESCUE AND EVACUATION WORKERS	The following workers are trained in rescue and evacuation (or describe client rescue organization):          (1)
Completed on: Signed:	

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

#### **Qualifications of the Person or Position That Prepares Plans**

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

#### Scope

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

#### Definitions

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

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

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

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

"Carabineer" - see Snaphook

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

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

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"Deceleration distance" means the additional vertical distance a falling employee travels, excluding lifeline elongation and free fall distance, before stopping, from the point at which the deceleration device begins to operate. It is measured as the distance between the location of an employee's body belt or body harness attachment point at the moment of activation (at the onset of fall arrest forces) of the deceleration device during a fall, and the location of that attachment point after the employee comes to a full stop.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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Drawing of Components

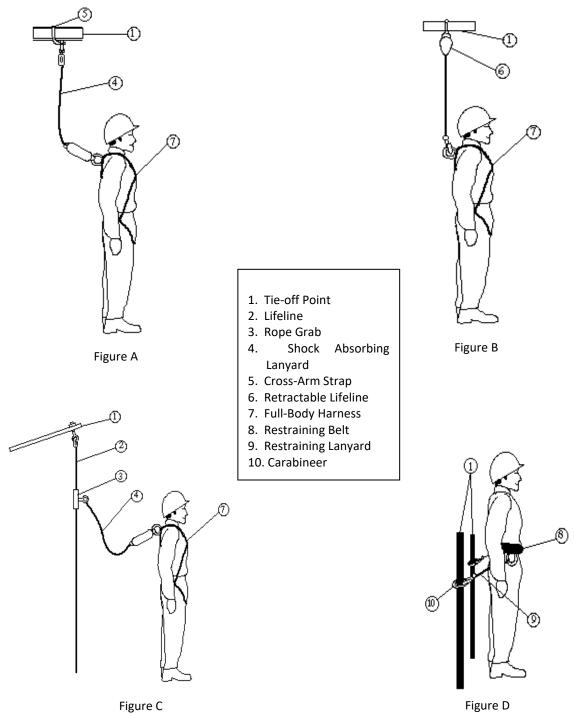


Figure C

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## Responsibilities

#### **Operations Manager**

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

#### Supervisor

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

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

#### Employees

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

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

#### Procedure

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

Fall protection equipment will meet the requirements of applicable ANSI, ASTM or OSHA requirements. When purchasing equipment and raw materials for use in fall protection systems all applicable ANSI and ASTM requirements should be met.

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## Minimum Standards

Fall protection must be provided to employees working at heights that exceed applicable regulatory thresholds.

Fall protection is required whenever employees are potentially exposed to falls from heights that exceed applicable regulatory thresholds. Guard rails, safety nets or personal or fall arrest systems should be used. Some applicable regulatory thresholds may include:

- General Industry 1910.23(b) Protection for wall openings and holes. Every wall opening from which there is a drop of more than 4 feet shall be guarded.
- Construction Industry 1926.501(b)(1) Unprotected sides and edges. Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.
- Marine Terminals 1917.112(b)(1) Guardrails shall be provided at locations where employees are exposed to floor or wall openings or waterside edges, including bridges or gangway-like structures leading to pilings or vessel mooring or berthing installations, which present a hazard of falling more than 4 feet (1.22 m) or into the water.
- Shipyard Industry 1915.73(d) When employees are exposed to unguarded edges of decks, platforms, flats, and similar flat surfaces, more than 5 feet above a solid surface, the edges shall be guarded by adequate guardrails.
- Steel Erection 1926.760(a)(1) Each employee engaged in a steel erection activity who is on a walking/working surface with an unprotected side or edge more than 15 feet (4.6 m) above a lower level shall be protected from fall hazards by guardrail systems, safety net systems, personal fall arrest systems, positioning device systems or fall restraint systems.

The following are minimum standards for WACO, INC. employee personal fall protection systems:

- All D-rings must be a minimum of 2¼ inches (inside diameter).
- All snap hooks shall not allow pressure to be applied to the gate in the opening direction.
- No pelican hooks on lanyards should be used as a primary connection.
- Connectors shall be drop forged, pressed or formed steel, or made of equivalent materials.
- Connectors shall have a corrosion-resistant finish, and all surfaces and edges shall be smooth to prevent damage to interfacing parts of the system.
- D-rings and snap hooks shall have a minimum tensile strength of 5,000 pounds.
- D-rings and snap hooks shall be proof-tested to a minimum tensile load of 3,600 pounds without cracking, breaking, or taking permanent deformation.
- Snap hooks shall be sized to be compatible with the member to which they are connected to prevent unintentional disengagement of the snap hook. Only a locking type snap hook designed and used to prevent disengagement of the snap hook by the contact of the snap hook keeper by the connected member shall be used.
- Horizontal lifelines shall be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.
- Lanyards and vertical lifelines shall have a minimum breaking strength of 5,000 pounds. Where vertical lifelines are used, each employee shall be attached to a separate lifeline.
- Lifelines shall be protected against being cut or abraded.

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- Self-retracting lifelines and lanyards which automatically limit free fall distance to 2 feet or less shall be capable of sustaining a minimum tensile load of 3,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Self-retracting lifelines and lanyards which do not limit free fall distance to 2 feet or less, rip stitch lanyards, and tearing and deforming lanyards shall be capable of sustaining a minimum tensile load of 5,000 pounds applied to the device with the lifeline or lanyard in the fully extended position.
- Anchorages used for attachment of personal fall arrest equipment shall be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds per employee attached, or shall be designed, installed, and used as part of a complete personal fall arrest system which maintains a safety factor of at least two and under the supervision of a qualified person.
- Systems used by an employee having a combined person and tool weight in excess of 310 pounds shall be modified to provide proper protection for such heavier loads.
- The attachment point of the body harness shall be located in the center of the wearer's back near shoulder level, or above the wearer's head, except when climbing.
- Body harnesses and components shall be used only for employee protection and not to hoist materials.
- Personal fall arrest systems and components subjected to impact loading shall be immediately removed from service and shall not be used again for employee protection until inspected and determined by a competent person to be undamaged and suitable for reuse.
- Provide for prompt rescue of employees in the event of a fall or assure that employees are able to rescue themselves.
- Personal fall arrest systems shall be inspected prior to each use for wear, damage and other deterioration, and defective components shall be removed from service.
- Personal fall arrest systems shall not be attached to guardrail systems, nor shall they be attached to hoists unless prior approval is obtained from a competent person.
- If and when a personal fall arrest system is used at hoist areas, it shall be rigged to allow the movement of the employee only as far as the edge of the walking/working surface.

## Stopping a Fall

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

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

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

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

## **Protection From Falling Objects**

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

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

## **Portable Ladders**

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

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

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

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

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

#### Storage

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

#### Inspections

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

#### Elevated Personnel Platforms

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

#### Prompt Rescue of an Employee in the Event of a Fall

WACO, INC. shall provide for prompt rescue of employees in the event of a fall or shall assure the employees are able to rescue themselves.

The pre-planning stage prior to the beginning of each elevated work assignment shall be evaluated by the supervisor to provide rescue of employees involved in a fall.

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## Fall Protection Plan

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

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

#### **Controlled Access Zones**

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

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

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

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

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

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

#### Safety Monitoring System

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

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

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

#### **Incident Investigations**

WACO, INC. shall conduct accident investigations in the event of a fall, near miss or other serious incident.

Accident investigations shall be conducted to evaluate the fall protection plan for potential updates to practices, procedures or training in order to prevent reoccurrence.

Changes to the fall protection program shall be implemented if deemed appropriate from incident corrective actions.

#### Training

Employees receive training pertaining to the recognition and elimination of fall hazards. A training program shall be provided for each employee who might be exposed to fall hazards. Training shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to follow to minimize these hazards.

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

Retraining – Retraining shall be provided when the following are noted:

- Deficiencies in training,
- Workplace changes
- Fall protection systems or equipment changes that render previous training obsolete.

All training is documented. Written certification records must be maintained showing the following:

- Who was trained
- When and dates of training
- Signature of person providing training
- Date WACO, INC. determined training was deemed adequate.

Training records shall be retained in the corporate office.

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To ensure our employees recognize to effect of fatigue as related to safely being able to perform work and to establish guidelines for work hours and equipment to reduce fatigue in our business and at our client locations.

#### Scope

This program applies to all WACO, INC. projects and operations.

#### Policy

The guiding principles of fatigue management shall be incorporated into the normal management functions of the business and include the following:

- Employees must be in a fit state to undertake work
- Employees must be fit to complete work
- Employees must take minimum periods of rest to safely perform their work

These principles will be managed through:

- The appropriate planning of work tasks, including driving, vehicle and equipment maintenance, loading and unloading and other job-related duties and processes
- Providing appropriate equipment to help reduce stress and fatigue
- Regular medical checkups and monitoring of health issues as required by legislation
- The provision of appropriate sleeping accommodations where required
- Ongoing training and awareness of employee health and fatigue issues

#### **Roles and Responsibilities**

The following addresses the roles and responsibilities of workers to report tiredness/fatigue to supervision and that supervision take appropriate action to assist the worker.

#### WACO, INC. Management

• Management accepts responsibility for the implementation of this fatigue management policy.

#### Site Manager

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

#### Roles and Responsibilities Employees in Safety Critical Positions

- Employees must present in a fit state free from alcohol and drugs;
- Employees must not chronically use over-the-counter, prescription drugs and any other product which may affect an employee's ability to perform their work safely, including fatigue that sets in after the effects of the drug wear off.

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- Employees shall report tiredness/fatigue and lack of mental acuity to supervision and supervisory personnel shall make safety critical decisions and take appropriate actions to prevent loss including replacement of tired employees, changing schedules or forcing work stoppages.
- Employees need to be rested prior to starting work.
- Employees need to monitor their own performance and take regular periods of rest to avoid continuing work when tired.

## Work Hour Limitations and Rest Breaks to Control Fatigue and Increase Mental Fitness

WACO, INC. has set the following procedures limiting work hours and controlling job rotation schedules, also known as staff/work balance, to help control worker fatigue. WACO, INC. will set work hour limitations and will control job rotation schedules to control fatigue, allow for sufficient sleep and increase mental fitness in an effort to control employee turnover and absenteeism.

- 1. Every Employee shall have necessary work breaks in order to avoid fatigue. These scheduled breaks will apply to both driving and on-site hours. The following shall be a minimum:
  - 15 Minutes each 2.5 hours
  - 30 Minutes after 5 Hours
  - 30 Minutes after 10 Hours
- 2. No Workers shall work more than:
  - 12 hours per day
  - 24 Days Continuous
- 3. Unfamiliar or irregular work should be avoided.
- 4. Chairs will be provided for workers to site periodically and WACO, INC. will provide periodic rest breaks for personnel.

## Use of Ergonomic Friendly Equipment

Ergonomic equipment will be used to improve workstation conditions such as anti-fatigue mats for standing, lift assist devices for repetitive lifting, proper lighting and controls of temperature and other ergonomic devices as deemed appropriate. Equipment to be used will be determined in the work task analysis.

## Analysis of Work Tasks to Control Fatigue

Work tasks to control fatigue must be analyzed and evaluated periodically. WACO, INC. will make any necessary changes to equipment, training or procedures based on the evaluation.

## Incident Analysis

If there is an incident there shall be an initial identification/assessment of evidence. Initial identification of evidence immediately following the incident might include a listing of people, equipment, materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc. and physical factors such as fatigue, age and medical condition.

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## Initial and Annual Training for Workers on Fatigue and Controlling Fatigue

WACO, INC. is committed to ensuring that all employees are competent to perform their tasks including:

- Fatigue management and health issues.
- WACO, INC. must provide initial and annual training on how to recognize fatigue, how to control fatigue through appropriate work and personal habits and reporting of fatigue to supervision.

A record of individual fatigues training and competency will be maintained.

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

#### Scope

Applies to all Waco, Inc. employees and all Waco, Inc. locations.

#### **Responsibilities**

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

#### Procedure

#### **Selection and Distribution**

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

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

#### Labeling Of Fire Extinguishers

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

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#### Maintenance

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

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

#### Inspection, Maintenance and Testing

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

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

#### Use

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

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

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

#### **Training and Education**

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

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

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

#### Initial Training Outline

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

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- General fire principles of a fire extinguisher
- Hazards employed with the use a fire extinguisher
- Use of a fire extinguisher

#### Retraining

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

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

#### Training Documentation

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

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

#### Scope

This program is applicable to all Waco, Inc. employees while engaged in work at Waco, Inc. facilities and/or facilities operated by others.

#### Responsibilities

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

#### Requirements

#### Planning

The site manager will:

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

#### Medical Response

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

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

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

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

#### Supplies and Equipment

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

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

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

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

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

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

## Transportation

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

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

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

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

Transportation needs must be preplanned and coordinated with the transportation provider prior to an incident requiring such service.

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## Training

Volunteers or selected employees are trained by the American Red Cross or equivalent in CPR and first aid. Each of these trained and certified employees are equipped with protective gloves and other required paraphernalia.

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Waco, Inc. full and part-time staff are expected to report for work fit for duty, which means able to perform their job duties in a safe, appropriate and an effective manner free from the adverse effects of physical, mental, emotional and personal problems.

#### Scope

This program applies to all Waco, Inc. projects and operations.

#### **Fitness for Duty Process**

It is the goal of Waco, Inc. to provide a safe workplace for all employees. To accomplish this goal we have adopted the following fitness for duty policy requirements. Supervisors will work with the human resources department when they have a concern about an employee's fitness for duty.

All requirements will be verified through documentation.

#### Pre-Employment Testing (Physical/Medical Suitability)

Employees are physically capable of performing their job function. Pre-employment physicals (medical exams) and physical evaluations are required to be included in the hiring (post-hire/pre-placement) process, and also when changing into certain job functions, transfers and different environments or in a post-injury returning to work situation (based on the severity of the injury).

#### Training and Safe Work Requirements (Skills and Knowledge)

Employees must have the required skills to perform their assigned tasks. This is evaluated and documented by any or all of the following for evaluation of the employee's required skills:

- Prior employment reference checks
- Certifications, licenses or other documentation verification
- Task testing
- On the job monitoring
- Performance evaluations
- Training and training retention

Employees are properly trained for their assigned tasks. Employees must receive training specific to their assigned task. Examples might be welding, instrumentation, scaffold building, equipment operator qualifications, respirator fit test, etc. based on a training matrix that reflects the job description and/or tasks being performed. All training is to be documented.

Safe work practices and procedures must be followed. Safe work procedures must be in place prior to work beginning. Employees shall follow our and our client's safety requirements. Examples may include, hot work permitting, confined space, lockout tagout, process safety management, electrical safety, operator safety and other standard work practices, safety rules or procedures.

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## Personal Medical Reporting Requirements

Employees must report all medications to their supervisor they are taking that could impair their ability to work safely. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor. The reporting must occur before the employee arrives for work or arranges for transportation to a remote site.

#### **Client Drug and Alcohol Testing Requirements**

Drug and alcohol testing for pre-employment, post-accident or random as prescribed by the host facility shall be implemented. Procedures must include and be implemented for drug and alcohol testing as prescribed by DOT or the host client facilities.

#### **Employee Activity and Behavior**

We will monitor employee activities and behaviors to determine if employees should be removed from the work site based on our drug and alcohol program requirements. Employee's activities and behaviors will be monitored to determine if employee should be removed from the work site if their ability to perform their duties safely is questioned.

#### **Fit for Duty Examination**

#### Confidentiality

Medical Records and other related records are protected by state and federal confidentiality laws and Waco, Inc. policy. The medical record of fitness for duty examination will be maintained in the Human Resources office. Employee medical records will not be released to unauthorized personnel without the employee's written consent or subpoena in accordance with state and federal laws.

#### Self-Referrals

Employees are responsible for notifying their supervisor if they are fatigued to the point of not being able to perform their duties safely. Employees must be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers.

Disciplinary action may occur for an employee not reporting to work in a condition which could endanger their safety or the safety of any other person(s). See below for Management Referral in case there is a question of the employee's ability to work safely.

#### Management Referral

#### Management Personnel Responsibility

Management personnel are responsible for monitoring the attendance, performance and behavior of their employees. When an employee's performance and/or behavior (including the odor of alcohol or possible use of any illegal substance) appears to be unsafe, ineffective and/or inappropriate, it is every manager's responsibility to challenge the employee's behavior and the ability to function, remove the employee from the job, refer the employee for a Fitness for Duty exam immediately and conduct appropriate follow up.

Due to the safety issues involved, supervisors have a special responsibility to implement this policy in a consistent and fair manner.

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## Procedure

- When any manager or their designee observes an employee who is not performing his/her job safely, appropriately, and effectively, or an odor of alcohol is present, or whose behavior is inappropriate, that manager is to remove the employee from her/his duty immediately and call Human Resources to continue the Fitness for Duty procedure. The employee will be referred to a medical provider for a fitness for duty exam.
- The Fitness for duty evaluation may include testing for chemical (e.g. alcohol and drug) levels, referral for psychiatric evaluation or any other evaluation or follow-up deemed necessary.
- The manager or designee must document the reasons for the fitness for duty request by recording the employee's behavior and noting the names of any witnesses who observed that behavior. Documentation must be submitted to Human Resources by the next business day.
- The employee is required to cooperate fully with the manager and medical personnel. The employee must sign consent forms for both the fitness examination and communication of its results in confidence to Human Resources. Refusal to cooperate will be considered insubordination and will be grounds for disciplinary action. The employee should be suspended pending investigation, which could result in termination.
- Medical personnel will advise Human Resources if the employee is fit or not fit for duty. The medical results of the fitness for duty exam will be communicated to Human Resources.
- If medical personnel determine that the employee is FIT FOR DUTY, the employee must contact Human Resources on the next general business day and the manager in consultation with Human Resources will determine discipline in situations where misconduct may have occurred.
- If medical personnel determine that the employee is NOT FIT FOR DUTY:
  - The manager makes every effort to arrange for safe transportation home for the employee.
  - The employee must contact Human Resources, on the next general business day.
  - The manager, in consultation with Human Resources, will determine discipline in situations where misconduct has occurred.

## Subsequent Fitness for Duty Exams

Dependent upon the reason for the fitness exam, employees who violate this policy a second time may be subject to progressive discipline, up to and including termination of employment.

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

#### Scope

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

#### Definitions

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

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

#### **Key Responsibilities**

#### Manager/Supervisor

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

#### Employees

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

#### Procedure

#### General

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

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

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

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

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

#### Safety Guards

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

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

#### Training

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

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

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

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

- 1. Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate,
- 2. Differences between the truck and the automobile,
- 3. Truck controls and instrumentation: where they are located, what they do, and how they work,
- 4. Engine or motor operation,
- 5. Steering and maneuvering,
- 6. Visibility (including restrictions due to loading),
- 7. Fork and attachment adaptation, operation, and use limitations,
- 8. Vehicle capacity,
- 9. Vehicle stability,
- 10. Any vehicle inspection and maintenance that the operator will be required to perform,
- 11. Refueling and/or charging and recharging of batteries,
- 12. Operating limitations,

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

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

#### <u>Certification</u>

Only trained and certified operators, including supervisors, are allowed to operate the device (this includes refresher training requirements).

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

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

## Operations

<u>General</u>

- All operators shall wear a safety seat belt when operating a forklift.
- Forklifts shall not be driven up to anyone standing in front of a bench or other fixed object.
- No person shall be allowed to stand or pass under the elevated portion of any forklift, whether loaded or empty.
- Unauthorized personnel shall not be permitted to operate forklifts.
- No riders or passengers are permitted.
- It is prohibited for arms or legs to be placed between the uprights of the mast or outside the running lines of the forklift.
- When a forklift is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, power shall be shut off, and brakes set.
- Wheels shall be blocked if the forklift is parked on an incline.
- A forklift is unattended when the operator is 25 ft. or more away from the vehicle, which remains in view, or whenever the operator leaves the forklift and it is not in view.

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- When the operator of a forklift is dismounted and within 25 ft. of the forklift still in view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement.
- A safe distance shall be maintained from the edge of ramps or platforms while on any elevated dock, or platform or freight car.
- Forklifts shall not be used for opening or closing freight doors.
- Brakes shall be set and wheel blocks shall be in place to prevent movement of trucks, trailers, or railroad cars while loading or unloading.
- Fixed jacks may be necessary to support a semi-trailer during loading or unloading when the trailer is not coupled to a tractor.
- The flooring of trucks, trailers, and railroad cars shall be checked for breaks and weakness before they are driven onto.
- There shall be sufficient headroom under overhead installations, lights, pipes, sprinkler system, etc.
- An overhead guard (cages) shall be used as protection against falling objects.
- An overhead guard is intended to offer protection from the impact of small packages, boxes, bagged material, etc., representative of the job application, but not to withstand the impact of a falling capacity load.
- Fire aisles, access to stairways, and fire equipment shall be kept clear.

#### <u>Traveling</u>

- The operator shall slow down and sound the horn at cross isles and other locations where vision is obstructed.
- If the load being carried obstructs forward view, the operator shall be required to travel with the load trailing.
- The operator shall be required to look in the direction of, and keep a clear view of the path of travel.
- Grades shall be ascended or descended slowly.
- When ascending or descending grades in excess of 10 percent, loaded forklifts shall be driven with the load upgrade.
- On all grades the load and load engaging means shall be tilted back if applicable, and raised only as far as necessary to clear the road surface.
- Under all travel conditions the forklift shall be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving and horseplay are prohibited.
- The operator shall slow down for wet and slippery floors.
- Dock board or bridge plates shall be properly secured before they are driven over.
- Dock board or bridge plates shall be driven over carefully and slowly and their rated capacity never exceeded.
- While negotiating turns, speed shall be reduced to a safe level by means of turning the hand steering wheel in a smooth, sweeping motion.

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• Except when maneuvering at a very low speed, the hand steering wheel shall be turned at a moderate, even rate.

## <u>Loading</u>

- Only stable or safely arranged loads shall be handled.
- Caution shall be exercised when handling off-center loads, which cannot be centered.
- Only loads within the rated capacity of the forklift shall be handled.
- Forklifts equipped with attachments shall be operated as partially loaded forklifts when not handling a load.
- A load engaging means shall be placed under the load as far as possible; the mast shall be carefully tilted backward to stabilize the load.
- Extreme care shall be used when tilting the load forward or backward, particularly when high tiering.
- Tilting forward with load engaging means elevated shall be prohibited except to pick up a load.
- An elevated load shall not be tilted forward except when the load is in a deposit position over a rack or stack.
- When stacking or tiering, only enough backward tilt to stabilize the load shall be used.

## **Operation of the Truck**

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

## Maintenance and Inspection of Forklifts

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

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- Forklifts shall not be altered so that the relative positions of the various parts are different from what they were when originally received from the manufacturer, nor shall they be altered either by the addition of extra parts not provided by the manufacturer or by the elimination of any parts.
- Additional counter weighting of fork trucks shall not be done unless approved by the truck manufacturer.
- Forklifts shall be inspected daily by the operator before being placed in service, and shall not be placed in service if the inspection shows any condition adversely affecting the safety of the forklift.
- Inspection shall be made at least daily prior to each shift. (visual non documented) Inspection items shall be posted on each forklift. Operators must insure the vehicle is safe prior to operating.
- Where forklifts are used on a round-the-clock basis, they shall be inspected before each shift.
- Defects when found shall be immediately reported to the supervisor, and corrected before operating the forklift.
- When the temperature of any part of any forklift is found to be in excess of its normal operating temperature, thus creating a hazardous condition, the forklift shall be removed from service and not returned to service until the cause for such overheating has been eliminated.
- Forklifts shall be kept in a clean condition, free of lint, excess oil, and grease.
- Noncombustible agents, where at all possible, shall be used for cleaning trucks.
- Low flash point (below 100 degrees F.) solvents shall not be used.
- High flash point (at or above 100 degrees F.) solvents may be used if precautions regarding toxicity, ventilation, and fire hazard are mitigated with the agent or solvent used.

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This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of Waco, Inc. facilities as related to the indicated general safety requirements that apply.

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

## **Key Responsibilities**

#### Waco, Inc. Safety Manager

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

#### Site Manager

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

#### Employees

- All shall be familiar with this procedure and the local workplace General Safety Requirements program.
- Follow all requirements, report unsafe conditions, and follow all posted requirements.
- Shall use the safeguards, safety appliances and personal protective equipment while following all safe work practices and procedures for the workplace.

#### **Competency and Training**

Workers shall be competent to operate equipment and perform job tasks. A competent worker means adequately qualified, suitably trained and with sufficient experience to safely perform work without supervision or with only a minimal degree of supervision. Work that may endanger a worker must be completed by a worker who is competent to do the work or by a worker who is working under the direct supervision of a worker who is competent to do the work. All workers must be trained in procedures until they are competent. Waco, Inc. shall permit only qualified by training or experience workers to operate equipment and machinery.

Training must include: procedures to be taken in the event of a fire or other emergency, the location of first aid facilities, identification of prohibited or restricted areas, precautions to be taken for the protection of the worker from physical, chemical or biological hazards, any procedures, plans, policies and programs that Waco, Inc. is required to develop and any other matters that are necessary to ensure the health and safety of the worker while the worker is at work.

Waco, Inc. shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

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### Inspections

Waco, Inc. shall ensure that frequent and regular inspections of the workplace, jobsites, materials, equipment and of work processes and procedures by a competent person to identify any risk to the safety or health of any person at the workplace.

Waco, Inc. shall ensure that every dangerous occurrence is investigated as soon as is reasonably possible.

Waco, Inc. must ensure that if a risk is identified we will correct any unsafe condition as soon as is reasonably practicable and, in the interim, take immediate steps to protect the safety and health of any person who may be at risk.

### **General Facility Requirements**

### Housekeeping

Each work site shall be kept clean and free from materials or equipment that could cause workers to slip or trip. A floor or other surface used by any worker shall be kept free of obstructions, hazards and accumulations of refuse, snow or ice.

Waco, Inc. requires that a worksite is sanitary and kept as clean as is reasonably practicable.

A reasonable supply of potable drinking water shall be kept readily accessible at a project for the use of workers.

### Safe Equipment Maintenance

Waco, Inc. has a duty to ensure our work site maintenance, systems of work and working environments ensure, as far as is reasonably practicable, the health, safety and welfare at work of the our workers.

We must and shall ensure that all equipment is maintained at intervals that are sufficient to ensure the safe functioning of the equipment. All equipment is to be maintained, safe to perform, adequate strength for its purpose and free from obvious defects. Damaged and faulty equipment reporting procedures must be in place.

Where a defect is found in equipment Waco, Inc. will ensure that steps are taken immediately to protect the health and safety of any worker who may be at risk until the defect is corrected and the defect is corrected by a competent person as soon as is reasonably practicable.

Any machinery, tool, material, or equipment which is not in compliance with any applicable OSHA requirement is prohibited. The machine, tool, material or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

Any worker who knows or has reason to believe that equipment under the workers control is not in a safe condition shall immediately report the condition of the equipment to Waco, Inc. and repair the equipment if the worker is authorized and competent to do so.

Waco, Inc. prohibits and will not require or permit compressed air to be directed towards a worker for the purpose of cleaning clothing or personal protective equipment used by that worker, or for any other purpose if the use of compressed air may cause dispersion into the air of contaminants that may be harmful to workers.

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Whenever workers are present at a worksite Waco, Inc. will provide lighting that is sufficient to protect the health and safety of workers and suitable for the work to be done at the worksite.

No worker is allowed to smoke in an enclosed place of employment, worksite or work-related area except in an area designated for smoking.

### Impairment

No person shall enter or remain at any workplace of employment while the person's behavior or ability to work is affected by alcohol, intoxicating beverages, drugs or other substance so as to so as to create a nuisance or if his or her abilities are impaired so as to endanger any person, or to create an undue risk to workers, endanger the person or anyone else.

### Improper Conduct

All workers shall engage in proper activity or behavior. Improper behavior that might create or constitute a hazard to any person is not acceptable. Improper activity or behavior includes horseplay, scuffling, fighting, practical jokes, and unnecessary running or jumping.

### **Industrial Hygiene**

Where a worker is exposed to a potential hazard of injury to the eye due to contact with a biological or chemical substance, an eyewash fountain shall be provided.

A worker who may be exposed to a biological, chemical or physical agent that may endanger the worker's safety or health shall be trained to use the precautions and procedures to be followed in the handling, use and storage of the agent, in the proper use and care of required personal protective equipment, and in the proper use of emergency measures and procedures.

No food, drink or tobacco shall be taken into, left or consumed in any room, area or place where any substance that is poisonous by ingestion is exposed.

Protective clothing or other safety device that has been worn next to the skin shall be cleaned and disinfected prior to being worn by another worker.

Workers who handle or use corrosive, poisonous or other substances likely to endanger their health shall be provided with washing facilities with clean water, soap and individual towels.

### **Thermal Stress**

A worker must not be exposed to levels that exceed those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. Clothing corrections must be applied in accordance with the heat stress and strain section of the ACGIH Standard.

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If a worker is or may be exposed Waco, Inc. must conduct a heat stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable to the local provincial or territorial agency and develop and implement a heat stress exposure control plan.

If a worker is or may be exposed Waco, Inc. must implement engineering controls to reduce the exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard. If the above action is not practicable, the employer must reduce the exposure of workers to levels below those listed in the screening criteria for heat stress exposure in the heat stress and strain section of the ACGIH Standard by providing; administrative controls, including a work-rest cycle, or personal protective equipment, if the equipment provides protection equally effective as administrative controls.

If a worker is or may be exposed, the employer must provide and maintain an adequate supply of cool potable water close to the work area for the use of a heat exposed worker.

If a worker shows signs or reports symptoms of heat stress or strain, the worker must be removed from the hot environment and treated by an appropriate first aid attendant, if available, or by a physician.

If a worker is or may be exposed to the conditions specified below Waco, Inc. the employer must conduct a cold stress assessment to determine the potential for hazardous exposure of workers, using measures and methods that are acceptable and develop and implement a cold exposure control plan.

- Thermal conditions that could cause cold stress or injury,
- Thermal conditions that could cause a worker's core body temperature to fall below 36°C (96.8°F), or
- Thermal conditions that are below the levels classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard.

If a worker is or may be exposed Waco, Inc. must implement effective engineering controls to reduce the exposure hazard to levels above those classified as "little danger" to workers in the criteria for the cooling power of wind on exposed flesh in the cold stress section of the ACGIH Standard. If the above action is not practicable Waco, Inc. must reduce the exposure hazard by providing effective administrative controls or personal protective equipment if the equipment provides protection equally effective as administrative controls.

A worker who is or may be exposed must wear adequate insulating clothing and personal protective equipment. If work takes place outdoors in snow- or ice-covered terrain where excessive ultraviolet light, glare or blowing ice crystals present a risk of injury to the eyes workers must wear eye protection appropriate to the hazards.

If a worker exposed to cold shows signs or reports symptoms of cold stress or injury the worker must be removed from further exposure and treated by an appropriate first aid attendant, if available, or a physician.

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# Purpose

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

This program applies to all Waco, Inc. employees who use hand and power tools.

### Scope

This program is applicable to all Waco, Inc. employees while engaged in work at Waco, Inc. facilities and/or facilities operated by others.

### Responsibilities

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

#### Managers/Supervisors

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

#### Employees

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

### Requirements

#### General

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

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

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

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

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

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

Tools shall never be placed unsecured on elevated places.

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

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

Shims shall not be used to make a wrench fit.

Wrenches with sprung or damaged jaws shall not be used.

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

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

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

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

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

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

### Portable Electric Tools

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

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

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

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

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

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

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

### Pneumatic Tools

Pneumatic tools shall never be pointed at another person.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Conductive hose should not be used near energized equipment.

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

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

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

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

### Powder Actuated Tools (Tools actuated by an explosive charge)

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

Explosive charges shall be carried and transported in approved containers.

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

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

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

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

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

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

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

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

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

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

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

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

### Hydraulic Power Tools

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

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

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

### Hydraulic Jacks

Loading and Marking

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

**Operation and Maintenance** 

- In the absence of a firm foundation, the base of the jack shall be blocked. If there is a possibility of slippage of the cap, a block shall be placed in between the cap and the load.
- The operator shall watch the stop indicator, which shall be kept clean, in order to determine the limit of travel. The indicated limit shall not be overrun.
- After the load has been raised, it shall be cribbed, blocked, or otherwise secured at once.
- Hydraulic jacks exposed to freezing temperatures shall be supplied with adequate antifreeze liquid.
- All jacks shall be properly lubricated at regular intervals.

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

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# Abrasive Blast Cleaning Nozzles

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

# **Fuel Powered Tools**

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

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

### **Guarding Portable Tools**

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

### Portable Circular Saws

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

### Switches and Controls

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

### Portable Abrasive Wheels

Safety Guards Exceptions

- Wheels used for internal work while within the work being ground.
- Mounted wheels used in portable operations 2 inches and smaller in diameter.

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

### Mounting and Inspection of Abrasive Wheels

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

### **Portable Grinders**

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

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

### Other Portable Grinders

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

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# **Personal Protective Equipment**

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

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### Purpose

- To provide guidelines for identifying, assessing and controlling workplace hazards;
- To ensure the potential hazards of new processes and materials are identified before they are introduced into the workplace;
- To identify the jobs/tasks which require risk assessment.

### **Key Responsibilities**

### As specified within this program.

WACO, INC. must assess a work site and identify existing or potential hazards before work begins at the work site or prior to the construction of a new work site

### Hazard and Risk Identification

The hazard identification process is used for routine and non-routine activities as well as new processes, changes in operation, products or services as applicable.

The Safety Manager shall conduct a baseline worksite hazard assessment which is a formal process in place to identify the various tasks that are to be performed and the Waco, Inc. identified potential hazards. The results are included in a report of the results of the hazard assessment and the methods used to control or eliminate the hazards identified. The hazard assessment report must be signed and have the date on it.

Inputs into the baseline hazard identification include, but are not limited to:

- Scope of work;
- Legal and other requirements;
- Previous incidents and non-conformances;
- Sources of energy, contaminants and other environmental conditions that can cause injury;
- Walk through of work environment;

Hazards identifications (as examples) are to include:

Working Alone

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- Thermal Exposure
- Isolation of Energy
- Hearing Protection
- Musculoskeletal Disorders
- Bloodborne Pathogens
- Confined Spaces
- Driving
- General Safety Precautions
- And any other established policy or procedure by WACO, INC.
- Any other site-specific work scope

WACO, INC. has a formal process for identifying potential hazards. Processes are in place to identify potential hazards by the use of JSA's, JHA's, facility wide or area specific analysis/inspections.

All identified hazards are assessed for risk and risk controls are assigned within the worksite hazard assessment for that specific hazard.

Employees and/or sub-contractors are actively involved in the hazard identification process. The WACO, INC. program provides processes to ensure employees and/or sub-contractors are actively involved in the hazard identification process and hazards are reviewed with all employees concerned.

Employees are trained in the hazard identification process. Employees will be trained in the hazard identification process including the use and care of proper PPE.

Unsafe hazards must be reported immediately and addressed by the supervisor. The supervisor discusses the worksite hazard assessment with employees at the respective work location during the employee's documented orientation.

### **Review of Hazard Assessment**

Existing worksite hazard identifications are formally reviewed annually or repeated at reasonably practicable intervals to prevent the development of unsafe and unhealthy working conditions and specifically updated when new tasks are to be performed that have not been risk assessed, when a work process or operation changes, before the construction of a new site or when significant additions or alterations to a job site are made.

The respective supervisor or project manager advises the Safety Manager when additional hazards are introduced into the work place in order to revise planning and assessment needs.

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# **Risk Assessment**

Hazards are classified and ranked based on severity. The program identifies hazards are classified/prioritized and addressed based on the risk associated with the task. (See the risk analysis matrix outlining severity and probability).

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#### WACO, INC. RISK ASSESSMENT MATRIX

	CONSEQUENCE					PROBABILITY				
					Α	В	С	D	E	
Severity	People	Assets	Environment	Reputation	Not Done	Rarely	Once a week	Several Times in a Week	Multiple Times in a Day	
0	No health effect	No damage	No effect	No impact						
1	Slight health effect	Slight damage	Slight effect	Slight impact						
2	Minor health effect	Minor damage	Minor effect	Limited impact						
3	Major health effect	Localized damage	Localized effect	Considerable impact						
4	Single fatality	Major damage	Major effect	National impact						
5	Multiple fatalities	Extensive damage	Massive effect	Global impact						

Kov	Manage for continuous improvement	Incorporate risk reduction measures	Intolerable
кеу	(Low)	(Medium)	(High)

# Risk Controls/Methods to Ensure Identified Hazards Are Addressed and Mitigated

The following describes how identified hazards are addressed and mitigated:

- Risk assessed hazards are compiled with and addressed and mitigated through dedicated assignment, appropriate documentation of completion, and implemented controls methods including engineering or administrative controls and PPE required into the worksite hazard assessment of the site specific HSE plan. No work will begin before the worksite assessment is completed. Additionally, no risk assessed as High (Intolerable) shall be performed.
- If an existing or potential hazard to workers is identified during a hazard assessment WACO, INC. must take measures to eliminate the hazard, or if elimination is not reasonably practicable, control the hazard. If reasonably practicable, WACO, INC. must eliminate or control a hazard through the use of engineering controls. If a hazard cannot be adequately controlled using engineering controls, WACO, INC. must use

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administrative controls that control the hazard to a level as low as reasonably achievable. If the hazard cannot be adequately controlled using engineering and/or administrative controls, WACO, INC. must ensure that the appropriate personal protective equipment (PPE) is used by workers affected by the hazard. WACO, INC. may use a combination of engineering controls, administrative controls, and personal protective equipment if there is a greater level of worker safety because a combination is used.

# **Emergency Control of Hazards**

Only those employees competent in correcting emergency controls of hazards may be exposed to the hazard and only the minimum number of competent employees may be exposed during hazard emergency control. An example is a gas leak in a building. Only those personnel with training on fire safety, gas supply shut off and other related controls will attempt to resolve the emergency control of a hazard. WACO, INC. will make every possible effort to control the hazard while the condition is being corrected or under the supervision of client emergency response personnel in every emergency.

### **Certification of Hazard Assessment**

The Safety Manager completes and signs the certification of hazard assessment for the worksite hazard assessment (also see PPE Program) and includes it within the site specific HSE plan. Hazard assessments are reviewed annually and updated when new tasks are to be performed that have not been risk assessed.

### Job Safety Analysis (JSA)

For those jobs with the highest injury or illness rates, jobs that are new to our operation, jobs that have undergone major changes in processes and procedures or jobs complex enough to require written instructions will have a Job Safety Analysis performed. Completed JSAs are available from the Safety Manager.

# Site Specific HSE Plan (SSSP)

Each work location has a site specific HSE plan. Each employee reporting to a location shall receive a documented orientation from a WACO, INC. supervisor that includes the SSSP for that site. The SSSP contains the WACO, INC. Health and Safety Policy, site specific safety requirements as well as a PPE matrix and a signed site-specific worksite hazard assessment for that location, which the WACO, INC. has a responsibility to provide.

# **Review Process**

The hazard assessment program will be reviewed to ensure no new hazards derived from the corrective measures. The review shall include a management of change consideration as well.

The safety committee shall be involved in the review process as well.

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# WORKSITE HAZARD ASSESSMENT FORM

# **CERTIFICATE OF HAZARD ASSESSMENT STATEMENT FOR** *form shall be signed* **SITE**

I certify a worksite hazard assessment was performed for this facility on *date* by the WACO, INC. Safety Manager. (Signature on File)

PPE ENGINEERING OR TASKS **RISK LEVEL** HAZARDS ADMINISTRATIVE CONTROLS (Refer to PPE Matrix) • List procedures that apply Use Risk Identify hazards List individual task • List appropriate engineering controls List appropriate PPE associated with task Matrix • List procedures or other administrative controls Chemical Exposure • WACO, INC. PPE Procedure Chemical gloves, splash proof Example: MED Washing Parts (Skin, Eyes, Body) • No smoking; goggles chemical apron • ٠ • ٠ ٠ ٠

 Task: Indicate Task Group
 (Additional Tasks shall be listed in each site specific HSE plan)

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# JOB SAFETY ANALYSIS FORM

Location / De	ion / Dept: Date:				Date:		New?	Revision		JSA NO:		
Task							Supervisor:					
Task							Analysis By:					
Team							Reviewed By:					
Members							Approved By:					
Specific rules and	d procec	dures	to be followed (Safe W	ork Pra	ctice Number):							
Sequence	of Basic	: Job	Steps	Potent	ial Injury or Hazards		Recommendation	s to Eliminate	or Redu	ice Potential Hazards.		
					CHECK ITEMS REQUI	RED TO DO TI	HIS JOB:					
Safety Glasses			Leather Gloves		Face Shield		Fire Extinguisher		Atmos	pheric Testing		
Hard Hats			Work Vest		Goggles (type?)		Lockout/Tagout		Traffic	Control		
Safety Shoes			Fall Harness		Flame Resistant Clothing		Warning signs		Other			

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# INSTRUCTIONS FOR COMPLETING THE JOB SAFETY ANALYSIS FORM

Select an employee to help you with the JSA: someone who is experienced in the job, willing to help and a good communicator. The employees play an important role in helping you identify job steps and hazards. In summary, to complete this form you should consider the purpose of the job, the activities it involves, and the hazards it presents. In addition, observing an employee performing the job, or "walking through" the operation step by step may give additional insight into potential hazards. Here's how to do each of the three parts of a Job Safety Analysis:

SEQUENCE OF BASIC JOB STEPS	POTENTIAL HAZARDS	RECOMMENDED ACTION OR PROCEDURE
Examining a specific job by breaking it down into a series of steps or tasks, will enable you to discover potential hazards employees may encounter.	A hazard is a potential danger. The purpose of the Job Safety Analysis is to identify ALL hazards – both those produced by the environment or conditions and those connected with the job procedure. To identify hazards, ask yourself these questions about each step:	Using the first two columns as a guide, decide what actions or procedures are necessary to eliminate or minimize the hazards that could lead to an accident, injury or occupational illness.
Each job or operation will consist of a set of steps or tasks. For example, the job might be to move a box from a conveyor in the receiving area to a shelf in the storage area. To determine where a step begins or ends, look for a change of activity, change in direction or movement.	Is there a danger of the employee striking against, being struck by, or otherwise making injurious contact with an object? Can the employee be caught in, by or between objects? Is there a	Begin by trying to: (1) engineer the hazard out; (2) provide guards, safety devices, etc.; (3) provide personal protective equipment; (4) provide job instruction training; (5) maintain good housekeeping; (6) ensure good ergonomics (positioning the person in relation to the machine or other elements).
Picking up the box from the conveyor and placing it on a hand truck is one step. The next step might be to push the loaded hand truck to the storage area (a change in activity). Moving the boxes from the truck and placing them on the shelf is another step. The final step might be returning the hand truck to the receiving area. Be sure to list all the steps needed to perform the job. Some steps may not be performed each time; an example could be checking the casters on the hand truck. However, if that step is generally part of the job it should be listed.	potential for slipping, tripping, or falling? Could the employee suffer strains from pushing, pulling, lifting, bending, or twisting? Is the environment hazardous to safety and/or health (toxic gas, vapor, mist, fumes, dust, heat, or radiation)? Close observation and knowledge of the job is important. Examine each step carefully to find and identify hazards – the actions, conditions, and possibilities that could lead to an accident. Compiling an accurate and complete list of potential hazards will allow you to develop the recommended safe job procedures needed to prevent accidents.	List the required or recommended personal protective equipment necessary to perform each step of the job. Give a recommended action or procedure for each hazard. Serious hazards should be corrected immediately. The JSA should then be changed to reflect the new conditions. Finally, review your input on all three columns for accuracy and completeness with affected employees. Determine if the recommended actions or procedures have been put in place. Re- evaluate the job safety analysis as necessary.

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### PURPOSE

The purpose of this plan is to establish a program and procedures for the safe use of hazardous chemical substances at Waco, Inc.

The Occupational Safety and Health Administration (OSHA) Hazard Communication Standard (HCS) 29 CFR 1910.1200 (General Industry) and 29 CFR 1926.59 (Construction Industry) call for the development of a hazard communication program when employees may be exposed to any chemical in the workplace under normal conditions of use or in a foreseeable emergency. In 2012, OSHA revised the HCS to align with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). As a result, this program has been revised to comply with the requirements of the OSHA HCS 2012. The written hazard communication program will include and address the following criteria in order to satisfy the minimum requirements of the OSHA HCS 2012:

- List of all hazardous chemicals known to be present in the workplace or individual work area
- Methods used to ensure that all containers, including pipes and holding tanks, are labeled, tagged or marked properly
- Methods used to obtain and maintain safety data sheets (SDSs)
- Methods used to provide employees with information and training on hazardous chemicals in their work areas
- Methods used to inform employees of the hazards of nonroutine work practices
- Methods used to provide the employees of other employers (e.g., consultants, construction contractors and temporary employees) on-site access to SDSs for each hazardous chemical that the other employer's employees may be exposed to while working in the workplace
- Methods used to inform the employees of other employers of precautionary measures that need to be taken to protect themselves during the workplace's normal operating conditions and in foreseeable emergencies
- Methods used to inform the employees of other employers of the labeling system used in the workplace

The hazard communication program will identify the following:

- Key personnel responsible for the program
- Location of chemical inventory list and SDSs
- Workplace labeling system
- Good work practices and procedures to minimize exposures
- How training will be performed
- Procedures to maintain the program and update the required information
- How records will be maintained

# 2.0 **RESPONSIBILITIES**

The Safety Coordinator, is responsible for administering the hazard communication program.

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This person is also responsible for:

- Reviewing the potential hazards and safe use of chemicals
- Maintaining a list of all hazardous chemicals and a master file of SDSs
- Ensuring that all containers are labeled, tagged or marked properly
- Providing new-hire and annual training for employees
- Maintaining training records
- Monitoring the air concentrations of hazardous chemicals in the work environment
- Properly selecting and caring for personal protective equipment
- Directing the cleanup and disposal operations of the spill control team
- Identifying hazardous chemicals used in nonroutine tasks and assessing their risks
- Informing outside contractors who are performing work on company property about potential hazards
- Reviewing the effectiveness of the hazard communication program and making sure that the program satisfies the requirements of all applicable federal, state or local hazard communication requirements

The purchasing agent, is responsible for:

• Contacting chemical manufacturers and/or distributors to obtain SDSs and secondary labels for hazardous chemicals used or stored in the workplace

The receiving department is responsible for:

- Reviewing incoming hazardous chemicals to verify correct labeling
- Holding hazardous chemicals in the receiving area until receipt of the SDS for the product

Employees are responsible for the following aspects of the hazard communication program:

- Identifying hazards before starting a job
- Reading container labels and SDSs
- Notifying the supervisor of torn, damaged or illegible labels or of unlabeled containers
- Using controls and/or personal protective equipment provided by Waco, Inc. to minimize exposure
- Following company instructions and warnings pertaining to chemical handling and usage
- Properly caring for personal protective equipment, including proper use, routine care and cleaning, storage, and replacement
- Knowing and understanding the consequences associated with not following company policy concerning the safe handling and use of chemicals
- Participating in training

# 3.0 CHEMICAL INVENTORY LIST

This list will contain the product identifier that is referenced on the appropriate SDS, the location or work area where the chemical is used, and the personal protective equipment and precautions for each chemical product. This list will be updated annually and whenever a new chemical is introduced to the workplace.

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# 4.0 LABELS AND OTHER FORMS OF WARNING

Each container of hazardous chemicals received from the chemical manufacturer, importer or distributor will be labeled with the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)
- Name, address and telephone number of the chemical manufacturer, importer or other responsible party

We will use the GHS labeling system for secondary containers. When a chemical is transferred from the original container to a portable or secondary container, the container will be labeled, tagged or marked with a GHS label containing the following information:

- Product identifier
- Signal word
- Hazard statement(s)
- Pictogram(s)
- Precautionary statement(s)

Portable containers into which hazardous chemicals are transferred from labeled containers and that are intended for the immediate use of the employee who performs the transfer do not require a label. If the portable container will be used by more than one employee or used over the course of more than one shift, the container must be labeled. Food and beverage containers should never be used for chemical storage.

Signs, placards, process sheets, batch tickets, operating procedures or other such written materials may be used in lieu of affixing labels to individual, stationary process containers as long as the alternative method identifies the containers to which it is applicable and conveys the information required for workplace labeling.

Where an area may have a hazardous chemical in the atmosphere (e.g., where extensive welding occurs), the entire area will be labeled with a warning placard.

Pipes that contain hazardous chemicals should be labeled in accordance with ANSI/ASME A13.1 and indicate the direction of flow. (Please note that this not a requirement of the OSHA HCS but a best practice or requirement of local jurisdiction.)

Workplace labels or other forms of warning will be legible, in English and prominently displayed on the container or readily available in the work area throughout each work shift. If employees speak languages other than English, the information in the other language(s) may be added to the material presented as long as the information is presented in English as well.

**Note:** After Dec. 1, 2015, distributors may not ship containers labeled by the chemical manufacturer or importer unless the label on the container meets GHS labeling requirements.

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# 5.0 SAFETY DATA SHEETS

An SDS will be obtained and maintained for each hazardous chemical in the workplace. SDSs for each hazardous chemical will be readily accessible during each work shift to employees when they are in their work areas.

SDSs will be obtained from the chemical manufacturer, importer or distributor. The name on the SDS will be the same as that listed on the chemical inventory list. SDSs for chemicals or process streams produced by Waco, Inc. will be developed and provided by the Safety Coordinator.

We will maintain the master file of all original SDSs.

SDSs for new products or updated SDSs for existing products will be obtained by the purchasing agent and forwarded to the safety coordinator. We will then update the master file with new and/or updated SDSs.

If problems arise in obtaining an SDS from the chemical manufacturer, importer or distributor, a phone call will be made to request an SDS and to verify that the SDS has been sent. The phone call will be logged and a letter will be sent the same day. Waco, Inc. will maintain a written record of all efforts to obtain SDSs. If these efforts fail to produce an SDS, the local OSHA office will be contacted for assistance.

### 6.0 EMPLOYEE INFORMATION AND TRAINING

Employees included in the hazard communication program will receive the following information and training prior to exposure to hazardous chemicals and when new chemical hazards are introduced to their work area:

- Requirements of the OSHA Hazard Communication Standard 29 CFR 1910.1200 (General Industry) or 29 CFR 1926.59 (Construction Industry)
- Operations in the work area where hazardous chemicals are present
- Location and availability of the hazard communication program, chemical inventory list and SDSs
- Methods and observations used to detect the presence or release of a hazardous chemical in the work area, such as monitoring devices, visual appearance or odor of hazardous chemicals when being released
- Physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified of the chemicals in the work area
- Measures employees can take to protect themselves from hazards, such as appropriate controls, work practices, emergency and spill cleanup procedures, and personal protective equipment to be used
- Explanation of the labels received on shipped containers
- Explanation of the workplace labeling system
- Explanation of the SDS, including order of information and how employees can obtain and use the appropriate hazard information

**Note:** To facilitate understanding of the new GHS system, the OSHA HCS requires that employees be trained regarding the new label elements and SDS format by Dec. 1, 2013. Employers are required to update the hazard communication program and to provide any additional training for newly identified physical or health hazards no later than June 1, 2016.

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# 7.0 NONROUTINE TASKS

The Safety Coordinator and the immediate supervisor of an employee performing a nonroutine task, such as cleaning machinery and other process equipment, is responsible for ensuring that adequate training has been provided to the employee on any hazards associated with the nonroutine task. Employees share in this responsibility by ensuring that their immediate supervisor knows that the nonroutine task will be performed.

Special work permits are required for the performance of certain nonroutine tasks, such as entry to confined spaces, breaking and opening piping systems, and welding and burning. For some special tasks, employees are required to follow special lockout/tagout procedures to ensure that all machinery motion has stopped and energy sources are isolated prior to and during the performance of such tasks.

# 8.0 CONTRACTORS

Prior to beginning work, Waco, Inc. will inform contractors with employees working on company property of any hazardous chemicals that the contractors' employees may be exposed to while performing their work. The Safety Coordinator will also inform contractors of engineering or work practice control measures to be employed by the contractor, personal protective equipment to be worn by the contractors' employees, and any other precautionary measures that need to be taken to protect their employees during the workplace's normal operating conditions and in foreseeable emergencies.

Furthermore, the Safety Coordinator will advise contractors that they must comply with all OSHA standards while working on company property. Appropriate controls will be established with the contractor to ensure that company employees are not exposed to safety and health hazards from work being performed by the contractor and that company operations do not expose contractors' employees to hazards.

The Safety Coordinator will inform contractors of the workplace labeling system and the availability and location of SDSs for any chemical to which contractors' employees may be exposed while performing their work.

# 9.0 RECORDKEEPING

Records pertaining to the hazard communication program will be maintained by the Safety Coordinator will keep the following records:

- Chemical inventory list
- Hazardous material reviews
- Copies of phone call logs and letters requesting SDSs
- Employee training records
- Warnings issued to employees for not following the hazard communication program

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# Purpose

This program is designed to reduce the risk of work-related heat illnesses.

### Scope

This procedure applies to all work being performed in hot environments.

### Definitions

"Acclimatization" means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.

"Heat Illness" means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

"Preventative recovery period" means a period of time to recover from the heat in order to prevent heat illness.

"Shade" means blockage of direct sunlight. Canopies, umbrellas and other temporary structures or devices may be used to provide shade. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning.

### Requirements

All managers and supervisors are responsible for implementing and maintaining the Heat Illness Program in their work areas.

### **Provision of Water**

Employees shall have access to potable drinking water. Employees shall have access to potable drinking water. Where it is not plumbed or otherwise continuously supplied, it shall be provided in sufficient quantity at the beginning of the work shift.

### Access to Shade

Employees will be provided with access to shade. Employees suffering from heat illness or believing a preventative recovery period is needed shall be provided access to an area with shade that is either open to the air or provided with ventilation or cooling. Such access to shade shall be permitted at all times. See definition of "Shade".

#### **Control Measures**

Each work location involved in working in hot environments shall implement measures that must be in place to control the effects of environmental factors that can contribute to heat related illnesses. The most common environmental factors are air temperature, humidity, radiant heat sources and air circulation.

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Physical factors that can contribute to heat related illness shall be taken into consideration before performing a task. The most common physical factors that can contribute to heat related illness are type of work, level of physical activity and duration, and clothing color, weight and breathability.

Supervisors must ensure personal factors that contribute to heat related illness are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. The most common personal factors that can contribute to heat related illness are age, weight/fitness, drug/alcohol use, prior heat-related illness, etc.

Each work site shall develop site specific procedures but shall include the minimum:

- Bring at least 2 quarts per employee at the start of the shift and the supervisors/designated persons will monitor water containers every 30 minutes, and employees are encouraged to report to supervisor/designated person low levels or dirty water.
- Supervisors will provide frequent reminders to employees to drink frequently.
- Every morning there will be short tailgate meetings to remind workers about the importance of frequent consumption of water throughout the shift during hot weather.
- Place water containers as close as possible to the workers.
- When drinking water levels within a container drop below 50%, the water shall be replenished immediately or water levels should not fall below the point that will allow for adequate water during the time necessary to effect replenishment.
- Disposable/single use drinking cups will be provided to employees or provisions will be made to issue employees their own cups each day.
- Supervisors will set-up an adequate number of umbrellas, canopies or other portable devices at the start of the shift and will relocate them to be closer to the crew, as needed.
- Non-agricultural employers can use other cooling measures if they demonstrate that these methods are as effective as shade.
- Working hours will be modified to work during the cooler hours of the day, when possible.
- When a modified or shorter work-shift is not possible, more water and rest breaks will be provided.
- Supervisors will continuously check all employees and stay alert to the presence of heat related symptoms.
- Supervisors will carry cell phones or other means of communication, to ensure that emergency services can be called and check that these are functional at the worksite prior to each shift.
- Every morning, workers will be reminded about address and directions to the worksite to inform medical responders and emergency procedures.
- All newly hired workers will be assigned a buddy or experienced coworker to ensure that they understood the training and follow the company procedures.

### Training

Training in the following topics shall be provided to all supervisory and non-supervisory employees:

• The environmental and personal risk factors for heat illness;

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- The importance of frequent consumption of small quantities of water, up to 4 cups per hour, when the work environment is hot and employees are likely to be sweating more than usual in the performance of their duties;
- The importance of acclimatization;
- The different types of heat illness and the common signs and symptoms of heat illness;
- The importance to employees of immediately reporting to the employer, directly or through the employee's supervisor, symptoms or signs of heat illness in themselves, or in co-workers;
- Waco, Inc. procedures for responding to symptoms of possible heat illness, including how emergency medical services will be provided should they become necessary;
- Waco, Inc. procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider;
- Waco, Inc. procedures for ensuring that, in the event of an emergency, clear and precise directions to the work site can and will be provided as needed to emergency responders.

Supervisors must receive training in the prevention of heat related illnesses prior to supervising employees working in heat. Supervisors will be trained in the Waco, Inc. heat illness emergency response procedures to prevent heat illness and procedures to follow when an employee exhibits symptoms consistent with possible heat illness, including emergency response procedures.

Communication for employees shall be in a form readily understandable by all affected employees.

Waco, Inc. shall ensure all contractors, subcontractors, staffing companies, etc. employees (including temporary) working outdoors have been trained in heat illness prevention.

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# Purpose

To ensure our employees know the hazards and how to work with Hydrofluoric Acid (HF) safely and how to respond to exposure or spills.

### Scope

This program sets forth accepted practices for Hydrofluoric Acid (HF). This program applies to all employees of WACO, INC., temporary employees, and any contractors working for WACO, INC.. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers WACO, INC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

### **Key Responsibilities**

### Managers and Supervisors

- Shall ensure all employees who are to be assigned to work at locations where Hydrofluoric Acid is known to be present, or suspected to be present in any concentration, have been trained in Hydrofluoric Acid safety.
- That each employee has been provided with a copy of this program.

### Employees

• Employees are responsible to comply with this program.

### Procedure

### Toxicity

- Hydrofluoric Acid is an inorganic acid which is derived from dissolving hydrogen fluoride in water. HF is noncombustible, colorless. HF possesses an irritating odor at or near the OSHA permissible exposure limit (PEL) of 3 ppm in air.
- The National Institute for Occupational Safety and Health immediately dangerous to life or health (IDLH) concentration for HF is 30 ppm in air.
- Hydrofluoric Acid is an extremely corrosive material which attacks all tissues of the body. Contact with the skin results in deep tissue burns that are extremely slow to heal. Contact with dilute (<25%) HF solutions may not be felt until a few hours has past, resulting in major tissue damage. Skin contact with higher concentrations of HF causes immediate and painful burns as well as massive tissue and bone destruction.
- Hydrofluoric Acid penetrates the skin, destroys underlying tissues and attacks the bone. Solutions as weak as 1% will still rapidly permeate the skin and severely damage underlying tissues.
- Hydrofluoric Acid vapor burns the eyes, ultimately leading to blindness. At concentrations of 10 ppm to 15 ppm HF vapors begin to irritate the eyes.
- Brief exposure (5 min) to concentrations greater than or equal to 50 ppm can be fatal. Ingestion of HF leads to severe burns of mouth and throat.
- HF is not a human carcinogen.

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# **Good Practices and Personal Protective Equipment**

- HF should be purchased in quantities which prevents abnormal amounts in storage. A three month supply or less is a good rule of thumb. Work with quantities that allow for quick and easy clean up by appropriate personnel if a spill occurs.
- Store Hydrofluoric Acid in original container or polyethylene bottles and in secondary containment.
- <u>Do not use glass</u>!
- Take specific steps to store HF away from ammonia and other bases.
- Proper PPE shall be provided to all employees. Proper PPE must be available for all personnel who work in or enter an HF alkylation unit for any reason.
- WACO, INC. shall ensure the inspecting protective equipment before use. All protective equipment, including new clothing, should be inspected per the manufacturer's suggested guidelines before use. Procedures should be developed for inspection, testing and replacement of protective clothing and equipment. Testing of gloves and inspection of boots should be done before each use.
- All work with HF must be performed in a chemical fume hood and handled with butyl rubber, neoprene, or double nitrile gloves.
- When using or pouring HF no area of the skin should be exposed.
- When handling solutions of HF, eye protection is a must.
- Proper cleaning of protective clothing is required after each use. Designated areas and facilities should be provided for neutralization, cleaning, and storage of all protective clothing. Since protective clothing is acid resistant, not acid proof, it should be washed and neutralized immediately after any contact with HF.
- The locations of safety showers and eye wash stations should be clearly marked and easily accessible.

### Incompatibilities

- HF attacks glass, concrete, and many metals.
- It also attacks organic materials, leather, natural rubber, and wood. Care should be taken to properly store HF with other acids and always with secondary containment.
- Do not store HF in glass containers!
- Store HF in its original container.

# Spills

- If you spill a small amount (minor spill) of Hydrofluoric Acid vacate the area and notify your supervisor for cleanup assistance.
- A major spill is any amount of chemical that the staff cannot easily and safely clean up without outside assistance. In this case, call your supervisor.
- If skin contact occurs, follow instructions for the use of calcium gluconate. A tube of calcium gluconate gel (antidote) should be readily available. Calcium gluconate works by combining with the HF to form insoluble calcium fluoride, thus preventing the extraction of calcium from tissues, bones, and the resulting burns.
- Calcium gluconate should be stored in a refrigerator, if possible, and replaced with a fresh supply just prior to its expiration date noted on the tube and packaging.
- All persons using HF shall be aware of the location and proper application of the gel.

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### Exposure

- Only authorized employees shall enter HF areas. The HF alkylation unit should be distinctively marked at all points of entry. Such markings should warn people that HF is present, that access is strictly limited and that protective clothing is required.
- First-aid kits are readily available in areas that HF may be present. Suitably equipped first-aid kits should be readily available in HF alkylation units and other areas of the refinery or facility where HF may be present.
- In the case of skin contact first aid must be started within seconds. If the skin contact is local, immediately remove any contaminated clothing and wash the area with water for 15 min. Apply generous amounts of calcium gluconate gel to the area.
- Gently massage the gel into the contaminated areas while using gloves.
- White specks appearing around the burned region indicates the formation of calcium fluoride and that the gel is working. Gently apply the gel for 15 minutes and reapply when the pain flares up.
- If larger amounts of HF are spilled, or if HF is spilled in a difficult area to wash, remove clothing and proceed immediately to the nearest safety shower. After showering apply the calcium gluconate gel.
- It is important to realize that calcium gluconate gel WILL NOT adequately neutralize the effect of HF on tissue by itself.
- Rinsing with water prior to application of the gel is critical.
- Notify medical responders where spill took place in.
- In case of eye contact, rinse the eyes with large amounts of water for a minimum of 5 min. and seek medical attention.
- Do not apply calcium gluconate gel to the eyes.
- If HF is ingested, contact medical help. Do not induce vomiting. If conscious, have the injured person ingest a glass of milk or milk of magnesia. If vomiting occurs naturally, help the person so they do not choke on the vomit.
- If HF vapor is inhaled, move the person to fresh air and seek medical attention at once.

# Disposal

- Hydrofluoric acid meets the requirements of a hazardous waste.
- Waste Hydrofluoric Acid must be placed in a compatible container (not glass), labeled with red hazardous waste tags and the tags need to be properly filled out.
- On the back of the waste tag, check off the box marked "corrosive."
- Place the waste container in a satellite accumulation area in secondary containment.
- Make sure the waste bottle is fitted with a proper screw cap.

# Training Employees on the Hazards of Hydrofluoric Acid (HF)

All personnel should receive at a minimum an overview on the hazards of HF, including medical treatment of burns, where the chemical is located on site and what to do in the unlikely event that a release has occurred.

Personnel trained in HF first aid should be available on all shifts. Personnel trained in HF first aid and knowledgeable about the specific health effects of HF should be available on all shifts.

Training shall be documented.

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# Purpose

The purpose of this program is to establish minimum requirements for site specific H2S safety, which will enhance safety in the occupational setting where hydrogen sulfide is present or is recognized as being potentially present.

### Scope

This program sets forth accepted practices for Hydrogen Sulfide (H2S). This program applies to all employees of WACO, INC., temporary employees, and any contractors working for WACO, INC.. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers WACO, INC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

### Definitions

- Contingency Plan a site-specific written document that provides an organized plan for alerting and protecting the public within an area of exposure following the accidental release of all potentially hazardous atmospheric concentrations of hydrogen sulfide.
- Exposure Level permissible exposure level of hydrogen sulfide is 10 PPM for an 8-hour, time weighted average.
- Gas Detector Instrument An instrument/detector to measure levels of H2S. Instruments may be electronically or manually operated.
- Hydrogen Sulfide (H2S) is an extremely deadly, toxic gas that in its pure state is colorless and is heavier than air. Additionally:
  - It is the second most toxic gas known to man, ranking behind hydrogen cyanide and ahead of carbon monoxide.
  - It has the odor of rotten eggs at low concentrations.
  - In higher concentrations rapidly paralyze the olfactory nerves (sense of smell).
  - Is soluble in water and is flammable and poses a definite threat of explosion.
- Parts Per Million (PPM) parts of vapor or gas per million parts of contaminated air by volume.
- Personal H2S Monitor An electronic instrument worn on the person that is set to alarm at 10 PPM of H2S.
- Possible Locations of H2S While clients are required to notify WACO, INC. of known H2S locations the
  majority of time H2S can be located in drilling operations, recycled drilling mud, water from sour crude
  wells, blowouts, tank gauging, during routine field maintenance involving hydrocarbons, tank batteries and
  wells.
- Venting the process of discharging a material to the atmosphere through a series piping and/or venting devices, to facilitate the proper and safe dispersion of toxic materials and to minimize personnel exposure.

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# **Key Responsibilities**

### Managers and Supervisors

- Shall ensure all employees who are to be assigned to work at locations where hydrogen sulfide is known to be present, or suspected to be present in any concentration, have been trained in hydrogen sulfide safety.
- To ensure employees have been medically approved to wear respirators and trained on the safe use of respirators, including a respirator fit test in accordance with WACO, INC.'s Respiratory Protection Program.
- To ensure employees have been trained and familiar with personal H2S monitors and gas detection instruments.
- To have been provided with the client's safety procedures.
- To ensure the necessary respiratory equipment to perform the work safely is available.
- That each employee has been provided with a copy of this program.

### Employees

• Employees are responsible to comply with this program.

### Procedure

### Physical Effects of Hydrogen Sulfide

- H2S paralyzes the sense of smell. Do Not Rely On Smell To Detect H2s Rely Strictly On Instruments Designed To Measure Concentrations Of H2s.
- Hydrogen sulfide is a very dangerous and deadly gas it is colorless and heavier than air.
- It can accumulate in low places and in small concentrations it has a strong, pungent, somewhat distasteful odor similar to rotten eggs. In higher concentrations, it can deaden the sense of smell (olfactory nerve).
- Exposure to certain concentrations of H2S can cause serious injury or death.

### **Toxic Effects of Hydrogen Sulfide**

CONCENTRATION	PHYSICAL EFFECT
.01 PPM	Can smell odor.
10 PPM	Obvious and unpleasant odor. Beginning eye irritation. ANSI permissible exposure level for 8 hours (enforced by OSHA).
100 PPM	Immediately Dangerous to life or Health (IDLH) Kills smell in 3-15 minutes; may sting eyes and throat. May cause coughing and drowsiness. Possible delayed death within 48 hours.
200 PPM	Kills smell shortly, stings eyes and throat. Respiratory irritation. Death after 1-2 hours exposure.
500 PPM	Dizziness; breathing ceases in a few minutes. Need prompt rescue breathing (CPR). Self-rescue impossible because of loss of muscle control.
700 PPM	Unconscious quickly; death will result if not rescued promptly. 1000 PPM Unconscious at once, followed by death within minutes.

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# General

WACO, INC. should have a written confined space program per 29 CFR 1910.146 and employees should be trained under CF 1910.146(g) and WACO, INC. will be aware of owners contingency plan provisions.

Each person entering a H2S designated location, regardless of the concentration, shall wear a personal H2S monitor that is set to alarm at 10 PPM and shall carry a 5-minute escape pack with them at all times.

When work requires opening any equipment on location that has the potential of releasing concentrations of H2S at 100 PPM or higher, two or more H2S trained persons shall be present and follow these procedures prior to and during the opening of the equipment:

- Each person entering the H2S location shall don a personal H2S monitor prior to entry.
- A tailgate meeting will be held with everyone on location to discuss the work plan, the responsibilities of each person and the site specific contingency plan.
- Each person shall have either a self-contained breathing apparatus (SCBA) or a supplied airline respirator equipped with a 5-minute escape pack, and shall be worn when opening the equipment to the surrounding atmosphere.
- At least one person (per two workers), equipped with a SCBA will act as a stand-by person and may not participate in the work being performed until the atmosphere has been tested and found to have no H2S present in quantities over 10 PPM. The stand-by person shall be stationed up wind, within 100 feet and in clear view of the workers.
- If an operator or other third party provides the stand-by person, it will be the responsibility of the WACO, INC. manager/supervisor in charge to verify that the person has been H2S, CPR, and First Aid trained, and that they have been provided the proper respiratory equipment.
  - o Only WACO, INC. employees may wear WACO, INC. respirator equipment.
  - If WACO, INC. employees will use client or other third party equipment, the equipment must be inspected to ensure it is safe to use and meets WACO, INC.'s requirements.
- After the equipment has been locked and tagged out (per WACO, INC. Lockout/Tagout Program), opened and the H2S concentration has been cleared to less than 10 PPM, the stand-by person will no longer be required. Work may then be performed without respiratory equipment, except for the required 5-minute escape pack.

# Safe Work Procedures

- Maintain compliance with permit requirements of WACO, INC. and any requirements by the client.
- Verify that proper safety equipment is available, functioning properly and is utilized.
- Check and remain aware of wind conditions and direction.
- Perform a thorough check of the downwind area prior to the start of any potentially hazardous work activity.
- Check for other personnel and ignition sources.
- Ventilate work areas by venting and purging lines and vessels prior to beginning any work activities.
- Keep all non-essential personnel away from work areas.
- Immediately vacate the area when any H2S monitor sounds and do not re-enter without proper respiratory protection.

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# Equipment

The following equipment shall be provided and used as required by this program:

- Personal H2S monitor set to alarm at permissible exposure limit of 10 PPM for OSHA 1926 requirements and 20 PPM for OSHA 1910 requirements. Fixed monitors may be present as well at the same alarm setting.
- Portable H2S gas testing instrument, either electronic or manual pump operated, capable of testing the suspected concentrations of H2S in the system.
- Each testing instrument must be capable of testing the suspected concentrations of H2S by using the manufacturer's recommended calibrated tube or other means of measuring the concentration of gas.
- Testing instruments shall be calibrated periodically according to the manufacturer's recommendation, and at least annually.
- Calibration kits with regulator for calibrating the personal monitor.
- Calibration gas cylinder for testing the personal monitor.
- NIOSH-certified self-contained breathing apparatus (air pack) with a minimum of a 30-minute air supply or airline respirator with escape SCBA should be used.
- Full face, air supplied, positive pressure hose line respirator, with 5 minute escape pack attached.
- Respirator wearers requiring corrective eyewear will be fitted with spectacle kits according to the respirator manufacturer, at no expense to the employee.
- Respirators and their components, including all fittings of hoses, shall not be interchanged, which if done, would violate the approval rating of said respirator or related equipment.

# Medical

Each employee shall have completed a medical evaluation by a physician or licensed health care professional to determine the employee's ability to wear a respirator as required by the WACO, INC. Respiratory Protection Program.

Each employee will successfully complete the medical questionnaire and examination before being allowed to be fit tested with a respirator.

# Training

Employees required to work on H2S locations will be trained. Training shall consist of:

- Physical and chemical properties of H2S
- Sources of H2S
- Human physiology
- Signs and symptoms of H2S exposure, acute and chronic toxicity
- Symptomatology of H2S exposure
- Medical evaluation
- Work procedures
- Personal protective equipment required working around H2S
- Use of contingency plans and emergency response
- Burning, flaring, and venting of H2S
- State and federal regulatory requirement
- H2S release dispersion models

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- Rescue techniques, first aid, and post exposure evaluation
- Use, care, and calibration of personal monitors and gas detection instruments
- Respirator inspections and record keeping

Each respirator wearer will complete Respiratory Protection training and a Respirator Fit Test, after being given a medical clearance and before entering any H2S location.

Employees and other personnel visiting H2S locations who will not be involved in the work shall be briefed on the following prior to entering:

- Site-specific sources of H2S
- Health hazards of H2S
- Routes of egress
- Emergency assembly areas
- Applicable alarm signals and
- How to respond in the event of an emergency.

### Rescue

Each employee, when working alone in a H2S designated area, shall plan and become familiar with self-escape procedures to include being aware of wind direction and obstacles to avoid when exiting the work area.

Employees working under the buddy system shall pre-plan an emergency rescue and/or evacuation procedure prior to commencing work, and arrange for periodic communications with his/her supervisor, and document the discussion on each employee's service report.

### **Respirator Inspections**

Respirators will be inspected by the employee before each use and at least monthly.

The inspection will include the respirator face piece, hose, harness, 5minute escape pack cylinder and all other components of the air supply systems used.

Monthly inspections will be documented as per WACO, INC. Respiratory Protection Program, and will be kept on file at the local office for review during safety audits.

### Monitors and Gas Detector Calibration

Each personal H2S monitor shall be calibrated at least monthly and the results recorded on the calibration log.

Those monitors that do not require calibrating shall be bump checked with calibration gas to test alarms, monthly or prior to use if not used routinely.

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# Purpose

The purpose of this program is to have effective procedures for reporting and evaluating/investigating incidents and non-conformances in order to prevent further occurrences.

### Responsibilities

Responsibilities for incident investigation will be assigned prior to occurrence of an incident. Individual responsibilities for reporting and investigation must be pre-determined and assigned prior to incidents.

#### Waco, Inc. Safety Manager

• Ensures investigations are conducted and assists in identifying corrective actions.

#### Site Manager and Supervisors

- Investigates (or assists in) incident investigations
- Corrects non-conformances
- Accompany injured employees to the medical provider for initial treatment.

#### **Employees**

 Immediately report any injury, job related illness, spill or damage to any property to their immediate supervisor. If their immediate supervisor is not available the employee is then to immediately notify the project manager. 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.

### Procedure

After immediate rescue or response, actions to prevent further loss will occur if the scene is safe. For example, maintenance personnel should be summoned to assess integrity of buildings 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.

### Investigations of Incidents & Non-conformances

Investigation is an important part of an effective safety program in that it determines the root cause and corrective actions necessary to prevent similar incidents or non-conformances.

The following must be reported to the employee's supervisor immediately. If that person is not available then the Waco, Inc. Safety Manager shall be immediately notified for:

- Near miss incidents with the potential to harm people, the environment or assets
- Work related injuries or illnesses; Property damage including vehicle incidents
- Hazardous chemical spillage, loss of containment and contamination
- Non-conformance to safety or environmental rules, policies or standards

The supervisor shall make the necessary notifications and begin the incident investigation process.

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In the case of a major injury or incident the scene of the event should be closed off and kept "as is" at the time of the incident. This is vital for effective incident investigation.

Incident investigation occurs as soon as possible, while the facts are still fresh within the minds of those involved (i.e. witnesses). Take the opportunity to talk to all of those involved before they become unavailable or memory fades. An incident investigation must be thorough and concerned only with cause and prevention and must be separate from administrative disciplinary action.

#### Equipment

Proper equipment will be available to assist in conducting an investigation. Equipment may include some or all of the following items; writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, flags, equipment manuals, etc. The Safety Manager shall have an incident investigation kit prepared in advance.

#### Incident Reporting Matrix

The Incident Reporting Matrix identifies, based on type of incident, who within corporate management shall be verbally notified and when. It also specifies which type of report from the field shall be completed based on the type of incident.

Reporting of the incident must occur in a specified manner based on site specific requirements and the reporting sequence shall be posted.

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM		
Minor First Aid	Owner Client	24 hrs	Yes		
Injury Above Minor First Aid	911 / Site Medical Response / Owner Client	ASAP	Yes		
As Required Injury Reporting	OSHA / Owner Client	Within 8 hrs	Yes		
Fire / Explosion	911 / Site Fire Response / Owner Client	ASAP	Yes		
Reportable Spill	Site Environmental / Owner Client	Within 24 hrs	Yes		
Property/Vehicle Damage	Owner Client	Within 24 hrs	Yes		

#### EXTERNAL INCIDENT NOTIFICATION MATRIX

#### INTERNAL INCIDENT NOTIFICATION MATRIX

TYPE OF INCIDENT	WHO TO NOTIFY VERBALLY	WHEN	INCIDENT REPORT FORM
Minor First Aid	Safety Manager	ASAP	Yes
Injury Above Minor First Aid	Safety Manager	ASAP	Yes
As Required Injury Reporting	President then Safety Manager	ASAP	Yes
Fire / Explosion	Safety Manager	ASAP	Yes
Reportable Spill	Safety Manager	ASAP	Yes
Property/Vehicle Damage	Safety Manager	ASAP	ASAP

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#### Time Elements for OSHA and Client Notification

Required incidents must be verbally reported to OSHA within 8 hours of their discovery. Incidents must also be reported to the owner client as soon as possible or in a timely manner (within 24 hours of incident).

#### **Incident Review Team and Incident Investigation Report**

All incidents will be investigated to the appropriate level with regards to incident severity. While all incidents should be investigated, the extent of such investigation shall reflect the seriousness of the incident utilizing a root cause analysis process or other similar method determined by the Waco, Inc. Safety Manager. They will form an Incident Review Team that participates in the determination of the final root cause investigative incident report. The team consists of representatives of management or other designees as assigned by the Waco, Inc. Safety Manager.

#### Initial Identification/Assessment of Evidence

Initial identification of evidence immediately following the incident could include a listing of people, equipment, and materials involved and a recording of environmental factors such as weather, illumination, temperature, noise, ventilation, etc.

#### **Collection/Preservation and Security of Evidence**

Evidence such as people, positions of equipment, parts, and papers must be preserved, secured and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment. All shall be dated.

#### Witness Interviews and Statements

Witness interviews and statements must be collected. Locating witnesses, ensuring unbiased testimony, obtaining appropriate interview locations, and use of trained interviewers should be detailed. The need for follow-up interviews should also be addressed. All items shall be dated.

The final incident investigation report consists of findings with critical factors, evidence, corrective actions, responsible parties, and timelines for corrective action completion.

Results of incident investigations are communicated to employees via the Incident Notice form.

#### Preparation of the Written Incident Report

Written incident reports will be prepared and include the Field Incident Report Form and a detailed narrative statement concerning the events. The format of the narrative report may include an introduction, methodology, summary of the incident, Incident Review Team member names, narrative of the event, findings and recommendations. Photographs, witness statements, drawings, etc. should be included.

The supervisor completes the Waco, Inc. Field Incident Report and takes the below steps when beginning an incident investigation.

- Provide emergency assistance, as needed and qualified for
- Secure the area as quickly as possible to retain area in the same condition at the time of the incident

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- Notify management by phone according to the Incident Notification Matrix
- Identify potential witnesses
- Use investigation tools, as needed (camera, drawings, video, etc.)
- Tag out for evidence any equipment that was involved
- Interview witnesses (including the effected employee) and obtain written, signed statements and fax to the Waco, Inc. Safety Manager
- Prepare Waco, Inc. Field Incident Report, sign the form, fax it to the Waco, Inc. Safety Manager
- Implement any immediate corrective actions needed

#### Incident Notice Form

Waco, Inc. shall provide documentation and communication of lessons learned and review of similar operations to prevent reoccurrence. Lessons learned are reviewed and communicated. Changes to processes must be placed into effect to prevent reoccurrence or similar events.

In order to communicate incident information and lessons learned from incidents the Waco, Inc. Safety Manager shall send the Incident Notice to all work sites. The form shall be posted on employee bulletin boards and shall be discussed in weekly safety meetings until all employees at the job site have been informed of the incident.

#### **Corrective Actions Resulting from Incident Investigations**

Incident investigations should result in corrective actions, individuals should be assigned responsibilities relative to the corrective actions, and these actions should be tracked to closure.

Site Managers are held accountable for closing corrective actions. Corrective actions for safety improvement input are posted at each site and tracked by the Waco, Inc. Safety Manager to ensure timely follow up and completion.

Corrective actions are also used as needed for revisions to site specific safety plans and the Waco, Inc. Safety and Health Management System.

#### **Injury Classifications**

Injuries shall be classified per the following:

First Aid – Dressing on a minor cut, removal of a splinter, typically treatment for household type injuries.

Lost Work Day Case (LWDC) – An injury that results in an employee being unfit to perform any work on any day after the occurrence of an occupational injury.

Number of Lost or Restricted Work Days – The number of days, other than the day of occupational injury and the day of return, missed from scheduled work due to being unfit for work or medically restricted to the point that the essential functions of a position cannot be worked.

Occupational Injury – An injury which results from a work related activity.

Occupational Illness – Any abnormal condition or disorder caused by exposure to environmental factors while performing work that resulted in medical treatment by a physician for a skin disorder, respiratory condition,

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poisoning, hearing loss or other disease (frostbite, heatstroke, sunstroke, welding flash, diseases caused by parasites, etc.). Do not include minor treatments (first aid) for illnesses.

Recordable Medical Case (RMC) – An occupational injury more severe than first aid that requires advanced treatment (such as fractures, more than one stitch, prescription medication of more than one dose, unconsciousness, removal of foreign body embedded in eye (not flushing), admission to a hospital for more than observation purposes) and yet results in no lost work time beyond the day of injury.

Restricted Work Day Case (RWDC) – An occupational injury which results in a person being unfit for essential functions of the regular job on any day after the injury but where there is no time lost beyond the day of injury. An example would include an injured associate is kept at work but not performing within the essential functions of their regular job.

Work or Work Related Activity – All incidents that occur in work related activities during work hours, field visits, etc. are reportable and are to be included if the occupational injury or illness is more serious than requiring simple first aid. Incidents occurring during off hours and incidents while in transit to or from locations that are not considered an employee's primary work are not reportable.

The following are examples of incidents that will not be considered as recordable:

- The injury or illness involves signs or symptoms that surface at work but result solely from a non-work-related event or exposure that occurs outside the work environment.
- The injury or illness results solely from voluntary participation in a wellness program or in flu shot, exercise class, racquetball, or baseball.
- The injury or illness is solely the result of an employee eating, drinking, or preparing food or drink for personal consumption (whether bought on the employer's premises or brought in). The injury or illness is solely the result of an employee doing personal tasks (unrelated to their employment) at the establishment outside of the employee's assigned working hours.
- The illness is the common cold or flu (Note: contagious diseases such as tuberculosis, brucellosis, hepatitis A, or plague are considered work-related if the employee is infected at work).

#### Training

Waco, Inc. shall train personnel in their responsibilities and incident investigation techniques. Personnel must be trained in their roles and responsibilities for incident response and incident investigation techniques. Training requirements relative to incident investigation and reporting are described below:

- Training frequency will be based on the specific are of responsibility but shall not exceed once every two years.
- Training requirements relative to incident investigation and reporting shall include:
  - o Awareness
  - o First Responder Responsibilities
  - The Initial Investigation at the Accident Scene
  - o Managing the Accident Investigation
  - o Collecting Data
  - o Analyzing Data

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- o Developing Conclusions and Judgments of Need
- Reporting the Results

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#### FIELD INCIDENT REPORT FORM

The Employee's Immediate Supervisor is to fill this form out then route it to the Safety Manager. <u>Attach employee's</u> and any witnesses written, signed statement.

## If a major injury is involved freeze the scene (equipment, paperwork, etc.) and prevent injury location from being disturbed until advised by the Safety Manger.

Job Related Illness	Job Related Injury	Near Miss	Property Damage <than \$500="" damage<br=""> &gt;Than \$500 Damage</than>			
Date & Time of Incident	When/Who Within Mgn	nt Was Notfied?	Supervisor Name:			
Location of Incident	Date & Time Employee	Reported to Supervisor:	Time/Date of Treatment			
Employee Name:		Position:	Experience In Position:			
TreatmentNone	First Aid	ClinicHospits	al Copy of Treatment Record Attached? Yes No			
Was this incident the result	of violating a safetyrule	e or procedure? Yes !	No			
Describe Body Injury or Job Illness or Property Damage:						
Form allows for space to be added						
Classification:First AidMedical RecordableWork RestrictionsLost Time						
	vas an injury, describe it.		xactly happened? What was the possible and use additional paper if			
Casual Factors Involved (C contributed to the incident. will assist in the investigatio	Include information abor on.		events and conditions that s, environment and other factors that			
Supervisors Suggested Imp	provements to Prevent a	Future Occurrence:				
Form allows for space t	o be added					
First Line Supervisor's Name First Line Supervisors Signature Date						
Project Manager Comn	nents Form allo	ows for space to be added	d			
Safety Manager Comments						
Senior Management Con	nments Form allo	ows for space to be added	1			

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## INCIDENT NOTICE

This notice is to be posted on all bulletin boards <u>and</u> documented in safety meetings and toolboxes at all locations until all staff are aware of the contents

## Vehicle Property Damage

Date: XX-XX-XXXX

## WHAT HAPPENED?

Provide just a one line factual statement...no names! Example:

A worker damaged a company vehicle by striking a concrete block while making a right turn on a road between buildings.

INSERT PHOTO

**INSERT PHOTO** 

## **HOW DID IT HAPPEN?**

Provide a concise determination...make the message clear! Example:

The main cause of this incident was the unsafe employee behavior by choosing not to pay attention to objects in the area while driving.

### WHAT DO WE DO NOW TO PREVENT THIS FROM HAPPENING AGAIN?

Insert your corrective actions...again no names. Example:

All drivers must:

- Continually assess road conditions and hazards and be prepared for any challenge that may approach them.
- Slow down around construction, large vehicles, emergency vehicles, wildlife, congested work areas, fog, rain or anything else that adds a hazard to your driving.

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(Mapp)			Initial Issue Date	01/06/2012
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INJURY/ILLNESS RECORDKEEPING			Revision No.	2
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#### Purpose

The purpose of this program is to define the requirements for recording job related injuries and illnesses for Waco, Inc..

#### Scope

This policy shall cover all Waco, Inc. operations within the United States. Specific guidelines are available at the following website link: http://www.osha.gov/recordkeeping/index.html.

#### **Key Responsibilities**

#### Safety Manager

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

#### Supervisors

• Shall ensure that all job-related injuries and illness are reported promptly to the Waco, Inc. Safety Manager.

#### Employees

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

#### Procedure

If Waco, Inc. is required to keep records of fatalities, injuries, and illnesses it must record each fatality, injury and illness that:

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

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

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

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#### Posting

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

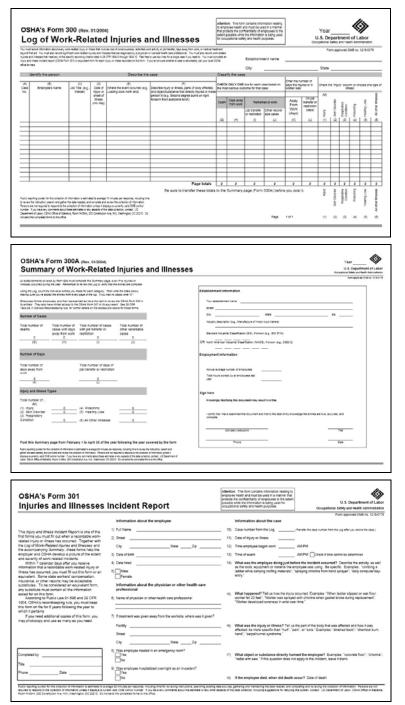
The annual summary must be posted no later than February 1st of the year following the year covered by the records and the posting kept in place until April 30th.

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

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

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#### **OSHA RECORDKEEPING FORMS**



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(Impo)			Initial Issue Date	01/06/2012
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JOB COMPETENCY			Revision No.	1
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#### Purpose

The purpose of this program is to establish general job competency requirements.

#### Scope

This procedure applies to all WACO, INC. operations.

#### Responsibilities

#### WACO, INC. Safety Manager

- Identifies, updates and monitors minimum qualification requirements, job titles and training documentation
- Supplies training reports to clients and WACO, INC. management.

#### Site Manager and Supervisors

- Shall ensure all employees assigned to their project meet job competency requirements and complete training identified in the training matrix.
- Shall ensure that any work that may endanger an employee must be completed by an employee who is competent to do the work.
- Shall ensure all employees have sufficient experience to safely perform work without supervision or with only a minimal degree of supervision.

#### Employees

• Attend and follow requirements of safety and health management training.

#### General

Competence is a combination of knowledge, understanding and skill, and the appropriate level of competence cannot be acquired simply by attending a training session. The understanding and skill are acquired by experience. For individuals involved in exposure to HSE hazards and risks experience and training are essential. The following components are to be considered for each worksite's delivery team for competency assurance:

#### Experience Level of Knowledge Capability to Perform

At WACO, INC. our view of competency assurance involves the continuous assessment of training and development needs against a person's responsibilities, abilities and critical activities. This process enables the continuous improvement loop that feeds back into training and development activities that ensure competency assurance is an ongoing career cycle process.

- 1. Job Description Identified → Candidate Selection and Hiring Process (Reference and Background Check, Drug Screen, Physical Assessment) → Person Assessed and Hired for Open Position
- 2. Experience, Qualifications Assessed for Initial Training  $\leftrightarrow$  Initial Induction Training Completion

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- 3. Further Training Required? If no → Ready for Work → On the Job Training → Competency Continually Assessed
- 4. Annual Performance Appraisal → Ready to Promote? → Employee Promoted → Further Training Required?

Competency is verified before employees are permitted to perform tasks independently. A competent person (supervisor, lead hand, instructor, etc.) must verify that an employee is competent to perform their roles and responsibilities before being allowed to work independently. If there is a site Short Service Employee (SSE) program established the new or transferred employee will fall under the SSE requirements as well.

#### Identification of Documentation

Documentation is obtained from employees to demonstrate they meet the qualifications of their job. Based on the job description requirements documentation may include educational, certifications, licenses, prior acceptable training course completion, etc. Documentation is reviewed and confirmed as actual during the employee hiring process.

#### **Identification of Positions**

An organizational chart and list of job titles has been established by WACO, INC.. Based on the positions and their exposure to risk their required training is entered into each worksite's training matrix. Job descriptions are prepared for each job title.

#### Identification of Qualifications

Minimum qualification requirements for each job title have been established by WACO, INC.. Qualifications may include a combination of education, certifications and work experience. Safety training completion for the indicated job title is required before full qualifications are met to allow an employee to begin work.

#### Identification of Training and Competency Needs

Employees (new or transferred) are provided job specific training related to their roles and responsibilities and trained on the tasks they perform on a regular basis. Training is identified in our training matrix which specifies safety and health training needs by job title. Our training matrix is updated based on changing risks.

#### **Training Records**

All training records are maintained on site either by the WACO, INC. Safety Manager or senior representative of management or their designee.

#### **Delivery of Induction, Transfer & Refresher Training**

Employees receive initial induction training. No work by any employee is allowed to begin until the orientation is completed.

Training requirements are tracked by the WACO, INC. Safety Manager and formal training sessions are conducted either on or off site by the Safety Manager or competent/qualified instructor for the required subject matter.

#### Supervisor Safety Management Training

Supervisors and managers receive annual, documented safety management system training.

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#### WACO, INC. Training Matrix

Additional training for identified hazards must be completed prior to employee exposure based upon a hazard assessment. <u>Sample shown as</u> each site must develop its own training matrix.	LOCATION	FREQUENCY	Admin	Management	Craft
Bloodborne Pathogens	All	А	PRN	х	Х
Confined Spaces	All	Ι		х	Х
Defensive Driver Awareness   Driving Safety	All	Ι	Х	х	Х
Electrical Safety - Unqualified	All	I		Х	Х
Emergency Response Plan	All	Ι	Х	х	Х
Fall Protection	All	Ι		х	Х
Fire Extinguishers	All	А	Х	х	Х
First Aid/CPR	PRN	2	PRN	PRN	PRN
H2S	All	Ι		х	Х
Hand and Power Tools	All	Ι		х	Х
HAZCOM	All	Ι	Х	х	Х
Hearing Conservation	All	А	Х	Х	Х
Isolation of Energy   LOTO	All	I		х	х
JHA	All	I	Х	Х	х
Ladder Safety	All	I		Х	х
Personal Protective Equipment	All	I		Х	х
Rigging Awareness	All	I		Х	х
Scaffolding	All	I		Х	х
Site Specific HSE Plan	All	I	Х	Х	х
Supervisor Safety Training	All	PRN	PRN	Х	PRN
PRN = As Required	Frequency: L - L	nitial A - Ann	ual 2 = 2 Vears	$2 - 2 y_{0} - 2 r_{0}$	

PRN = As Required

Frequency: I = Initial A = Annual 2 = 2 Years 3 = 3 years

#### **Training Documentation**

All training must be documented with: date; employee name, employee signature; instructor name; instructor signature and title of course.

Each new employee shall receive an orientation prior to beginning any work.

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			Next Review Date:	02/01/2025
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#### Purpose

The purpose of the program is to prescribe rules and establish minimum requirements for the construction, care, and use of the common types of ladders.

All ladders that are purchased and placed into service; or, any ladders that are engineered, manufactured and installed on any Waco, Inc. equipment shall follow the requirements set forth by this program.

#### Scope

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

#### Definitions

Ladder - an appliance usually consisting of two side rails joined at regular intervals by cross- pieces called steps, rungs, or cleats, on which a person may step in ascending or descending.

Stepladder - a self-supporting portable ladder, nonadjustable in length, having flat steps and a hinged back. Its size is designated by the overall length of the ladder measured along the front edge of the side rails.

Single ladder - a non-self-supporting portable ladder, nonadjustable in length, consisting of but one section. The overall length of the side rail designates its size.

Extension ladder - a non-self-supporting portable ladder adjustable in length. It consists of two or more sections traveling in guides or brackets so arranged as to permit length adjustment. Its size is designated by the sum of the lengths of the sections measured along the side rails.

Fixed ladder - a ladder permanently attached to a structure, building, or equipment.

Individual-rung ladder - a fixed ladder each rung of which is individually attached to a structure, building, or equipment.

Cage - a guard that may be referred to as a cage or basket guard, which is an enclosure that is fastened to the side rails of the fixed ladder or to the structure to encircle the climbing space of the ladder for the safety of the person who must climb the ladder.

#### **Key Responsibilities**

#### Managers and Supervisors

• Managers and supervisors are responsible for ensuring that all employees, and/or contractors have been trained in the use and inspection of ladders in accordance to the manufactures guidelines.

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• Managers and supervisors are responsible for ensuring that all employees and contractors are aware that if an inspection discovers a defect, the ladder shall not be used and taken out of service.

#### Employees

- Employees shall inspect ladders prior, during and at the completion of each use to ensure the condition of the ladder and the safety of its occupants.
- Employees are responsible for following this program and reporting any damage or repairs that may be needed to their supervisor.

#### Procedure

#### Inspection, Care and Safe Work Practices of Ladders

#### Inspection

Ladders shall be inspected by a competent person for visible defects on a periodic basis and after any occurrence that could affect their safe use.

- Ladder rungs must be uniformly spaced or meet OSHA/ANSI specifications. Ladder rungs, cleats, and steps shall be parallel, level, and uniformly spaced, when the ladder is in position for use.
- Portable and fixed ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components, shall either be immediately marked in a manner that readily identifies them as defective, or be tagged with "Do Not Use" or similar language, and shall be withdrawn from service until repaired
- If a ladder is tipped over, it shall be inspected by a competent person for side rail dents or bends, or excessively dented rungs; check all rung to side rail connections; check hardware connections; check rivets for shears.
- Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment shall not be used; improvised repairs shall not be made.
- All wood parts shall be free from sharp edges and splinters; sound and free from accepted visual inspection from shake, or other irregularities.

#### Care

Ladders shall be maintained in good condition at all times, the joint between the steps and side rails shall be tight, all hardware and fittings securely attached, and the movable parts shall operate freely without binding or undue play.

Metal bearings of locks, wheels, pulleys, etc., shall be frequently lubricated.

Frayed or badly worn rope shall be replaced. Safety feet and other auxiliary equipment shall be kept in good condition to ensure proper performance.

Rungs shall be kept free of grease and oil.

Ladders shall be stored in a well-ventilated area in a manner to prevent sagging and warping.

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#### Ladder Safe Work Practices

Ladders shall be used only for the intended purpose for which they were designed.

The ladder shall be secured at the top or held by another person at the base.

The footing of the ladder shall be placed on a stable and level surface.

Extension ladders shall be placed at a 4:1 ratio. Ladders shall be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder (the distance along the ladder between the foot and the top support.

When ladders are not able to be extended then the ladder shall be secured at its top to a rigid support that will not deflect.

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

Ladders shall not be used in a horizontal position as platforms, runways, or scaffolds.

Ladders shall not be used by more than one man at a time.

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

If a ladder is used in a high traffic area, barricades shall be placed to avoid accidental displacement due to collisions.

Do not stand on the top two rungs or top of step ladders.

On two-section extension ladders the minimum overlap for the two sections in use shall be as follows:

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

Ladders shall extend a minimum of 3 feet above top of upper landing surface. The ladder side rails shall extend at least 3 feet (.9m) above the upper landing surface. When ladders are not able to be extended then the ladder shall be secured at its top to a rigid support that will not deflect.

The employee shall maintain a three (3)-point grip on the ladder at all times and carry tools/equipment on a belt or hoist up. Do not carry anything in the hands that could cause injury in case of fall.

The employee shall face the ladder while ascending or descending.

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

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The ladder shall not be moved while occupied.

#### **Portable Ladders**

Stepladders shall not be longer than 20 feet. Single ladders shall not be longer than 30 feet.

A two-section extension ladders shall not be longer than 60 feet. All ladders of this type shall consist of two sections, one to fit within the side rails of the other, and arranged in such a manner that the upper section can be raised and lowered.

Keep all ladders at least ten (10) feet away from power lines.

Ladders shall have the correct load capacity for the task and not be loaded beyond the maximum intended load for which they were built nor in excess of the manufacturer's rated capacity. Weight includes the combined weight of the climber and his tools/equipment. Ladders are rated as the following:

- I (holds 250 lbs)
- I-A (holds 300 lbs)
- II (holds 225 lbs)
- III (holds 200 lbs)

#### Fixed Metal Ladders

Ladders shall be constructed to withstand a minimum of 200 pounds.

All metal rungs shall have a minimum diameter of  $\frac{3}{4}$  inches and wooden rungs shall have a minimum diameter of 1 1/8 inches.

Rungs shall not be more than 12 inches apart and shall be uniform throughout the length of the ladder.

Rungs shall be a minimum length of 16 inches and provide protection so a foot cannot slip off the end.

Rungs shall have a minimum of 7 inches between itself and the structure behind it.

A fall restraint system must be provided for all fixed ladders greater than six feet in length.

- A Cage is required when the fixed ladder is at least twenty feet tall.
- Cages on fixed ladders shall not begin at a point less than 7 feet nor greater than 8 feet from the walking surface below the cage.
- Cages shall provide a clear width of 15 inches in each direction of the rung's centerline.
- Cages shall not extend less than 27 inches, but not greater than 28 inched from the centerline of the rung.
- A climbing fall restraint system may be substituted for a ladder cage.

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#### Purpose

The purpose of this procedure is to advise employees in areas where lead is suspected on an awareness level basis about the properties and dangers of lead, general guidelines and training requirements. For more information refer to the Lead safety procedure for Waco, Inc..

#### Scope

This procedure applies to Waco, Inc. operations where employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Waco, Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

#### Responsibilities

#### **Managers and Supervisors**

- In coordination with the Safety Manager, develop and implement annual lead awareness training.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Identify possible locations where lead in the workplace may be found.
- Inform the Safety Manager of upcoming work involving known or suspected lead-containing materials, allowing the Safety Manager to provide any necessary monitoring or other required actions.
- Ensure employees comply with the lead awareness requirements.

#### Safety Manager:

• Coordinate annual lead awareness training activities.

#### **Employees:**

- Comply with the lead awareness requirements and direct any questions or concerns to the Safety Manager.
- Attend required annual training.
- Review material safety data sheets or consult with the supervisor to identify any container with leadcontaining material.

#### Procedure

#### Health Effects of Lead

Common symptoms of acute lead poisoning are loss of appetite, nausea, vomiting, stomach cramps, constipation, difficulty in sleeping, fatigue, moodiness, headache, joint or muscle aches, and anemia. Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

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#### Locations

Each worksite shall create a list of possible locations of lead containing materials such as leaded paints, leaded solders, pipes, batteries, circuit boards, cathode ray tubes, leaded glass, and demolition/salvage materials.

The list is to be provided to the Safety Manager on a quarterly basis and revised as lead containing materials are added or eliminated from the previous list.

#### **General Requirements**

Employees must abide by any signs/labels/assessment reports indicating the presence of lead containing materials and will not disturb the lead containing material. Appropriate work practices shall be followed to ensure the lead containing materials are not disturbed. Regulated access signs are to demarcate the lead exposure regulated work areas. The signs should read as follows:

#### WARNING LEAD WORK AREA POISON NO SMOKING OR EATING

#### General Work Practices

When working on multi-contractor worksites Waco, Inc. employees shall be protected from exposure. If employees working immediately adjacent to a lead abatement activity are exposed to lead due to the inadequate containment of such job, Waco, Inc. shall either remove the employees from the area until the enclosure breach is repaired or perform an initial exposure assessment.

Employees will wash hands and face if lead materials are contacted. Employees' hands and faces shall be washed if lead containing materials are contacted. Any possible contact with lead containing material must be reported immediately to the supervisor or Safety Manager.

If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed.

When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system.

Whenever possible, use a wet system to reduce airborne dust.

Whenever possible, substitute lead material with non-leaded material.

Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.

If respirators are required, they will be NIOSH certified and all employees will follow the Waco, Inc. Respiratory Protection Program.

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#### Training

Lead awareness training is required at time of hire, during orientation or before initial assignment in areas where lead is suspected and annual refresher training is conducted. Lead awareness training is required for employees whose work activities may contact lead containing materials but do not disturb the material during their work activities. Lead awareness training is required at time of hire, during orientation, or before assignment to areas containing lead.

Refresher training must be given annually.

Documentation of training - Lead awareness training shall be documented including dates of training, location of training, employee name and trainer name.

Training will include the health effects of lead, how to report suspected locations of lead containing material and not to disturb any possible lead containing material.

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

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#### Purpose

The purpose of this procedure is to identify the controls and actions necessary to prevent adverse health effects to employees from occupational exposure to lead, and to ensure that Waco, Inc. lead exposure management practices meet regulatory requirements.

#### Scope

This procedure applies to Waco, Inc. operations where employees may be exposed to lead while working with lead containing materials during routine maintenance or emergency situations. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Waco, Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

#### Responsibilities

#### **Managers and Supervisors**

- In coordination with the Safety Manager, develop and implement written project/task specific lead exposure management procedures prior to the start of activities to reduce exposure to or below the permissible limits.
- Ensure personnel are aware of work that has the potential of exposure to lead.
- Ensure individuals responsible for monitoring areas of exposure are properly trained.
- Ensure personnel receive documented medical surveillance.
- Ensure that all affected employees receive initial and annual lead management training.
- Inform the Safety Manager of upcoming work involving lead-containing materials, allowing the Safety Manager to provide any necessary monitoring.
- Ensure employees have the appropriate personal protective equipment (PPE) and are properly trained in its use and care, including respiratory protection, full body disposable clothing and gloves, when the Action Level is expected to be met or exceeded.
- Ensure employees comply with the lead exposure management procedure.

#### Safety Manager

- Coordinate air sampling and monitoring activities, ensuring monitoring equipment is in proper working
  order and, as necessary, modifying the lead exposure management procedures to reflect exposure
  monitoring data.
- Maintain the lead exposure management procedure, notifying management of any regulatory changes and ensuring compliance with federal and state requirements.
- Coordinate initial and annual refresher training activities.
- Coordinate the medical surveillance program for employees exposed to lead above the Action Level for more than 30 days per year.
- Coordinate waste management and disposal activities; ensuring waste with lead containing materials is disposed of only at an approved facility.

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#### Affected Employees

- Comply with the lead exposure management procedure, consulting with the supervisor or Safety Manager to ensure the proper PPE is used when required.
- Comply with the medical surveillance program.
- Attend initial and annual refresher training.
- Wear respiratory protection equipment and other specified PPE as required by the project/task specific control program.
- Maintain respiratory protection equipment in good working order, notifying the supervisor or Safety Manager of any problems prior to starting work.
- Review material safety data sheets or consult with the supervisor to identify any container with leadcontaining material.
- Leave the work area to wash if skin irritation is noted or if PPE has been compromised.

#### Procedure

#### Written Compliance Program

- Each worksite shall develop and implement written project/task site specific lead exposure management procedures prior to the start of activities to reduce exposure to or below the permissible limits if exposure is possible.
- The procedure shall include engineering controls, work practices, PPE, documentation of air sampling, including the source of lead, a description of each lead related task in which lead is emitted should be outlined and all employees shall be trained prior to work beginning.
- The program shall be revised and updated at least every 6 months.

#### Permissible Exposure Limits

- Per OSHA regulation, employees shall not be exposed to greater than 50 micrograms per cubic meter of air (50 μg/m3), time-weighted average, during an 8-hour workday. This permissible exposure limit (PEL) includes the use of respiratory protection. If an employee is exposed more than 8 hours in any one workday, the maximum PEL (μg/m3) shall be calculated by using the following formula:
- 400/hours worked in the day
- For example: 400/12 hours = 33.33 μg/m3
- If respirators are used to supplement engineering and/or work practice controls, the respirator's protection factor may be used to determine compliance with the PEL.

#### Exposure (Air) Monitoring

- Exposure is defined in this section to be any employee who is not wearing a respirator to meet the Action Level and monitoring requirements in this section
- Initial air samples shall be representative of the employee's regular, daily activities.
- Initial breathing air sampling results:
  - If the initial monitoring is less than the Action Level, monitoring need not be repeated unless there has been a production, process, control, or personnel change which may result in new or additional exposure to lead

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- If the initial determination or subsequent monitoring reveals employee exposure to be at or above the Action Level but below the PEL, monitoring must be performed at least every six (6) months, with the cycle continuing until two (2) samples taken at least seven (7) days apart are below the action level
- If the initial determination exceeds the PEL, monitoring will be performed quarterly until two (2) samples taken at least seven (7) days apart are below the PEL but above the Action Level, and the monitoring frequency described above will be used
- Within 15 working days after the receipt of the results of any monitoring Waco, Inc. shall notify all affected employees of these results either individually in writing or by posting the results in an appropriate location that is accessible to affected employees.
- Whenever the results indicate that the exposure, without regard to respirators, exceeds the permissible exposure limit, Waco, Inc. shall include in the written notice a statement that the permissible exposure limit was exceeded and a description of the corrective action taken or to be taken to reduce exposure to or below the permissible exposure limit.

#### **Control Measures**

#### Engineering Controls

- If an employee is exposed to lead above the PEL for 30 or more days in a year, engineering controls, including administrative controls, will be implemented to reduce the exposure to or below the permissible exposure. If such controls are not feasible Waco, Inc. must demonstrate and document the reasons.
- Respiratory protection will be used if engineering and administrative controls are not effective in reducing the exposure to or below the PEL
- If air is re-circulated back into the workplace, the system must be equipped with a HEPA (high efficiency particulate air) and backup filter, and a system to monitor the lead level will be installed
- When using mechanical means to remove lead-containing paints or coatings, use equipment which is equipped with a HEPA collection system
- Whenever possible, use a wet system to reduce airborne dust
- Whenever possible, substitute lead material with non-leaded material

#### Administrative Controls

- Administrative controls will include job rotation schedules to reduce employee PEL exposure.
- When exposure to lead is at or above the PEL Waco, Inc. shall provide lunch rooms, decontamination, changing, shower and hygiene facilities.
- Regulated access signs will demarcate the lead exposure regulated work areas. Signs should not be removed or defaced. The signs will read as follows:

#### WARNING LEAD WORK AREA POISON NO SMOKING OR EATING

#### Personal Protective Equipment

• Respirators shall be used during the time period required to install or implement control if engineering and work practices are insufficient as well as for emergency use.

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- PPE will be selected on the basis of its ability to prevent absorption, inhalation and ingestion and will be provided to employees at no cost.
- PPE will reflect the needs of the employee based on work conditions, amount and duration of exposure and other known environmental factors.
- If respirators are required, they will be NIOSH certified and all employees will follow the Waco, Inc. Respiratory Protection Program.
- An employee may choose a NIOSH certified powered, air purifying respirator (PAPR) at no extra cost to the employee. The respirator shall be used during the time period necessary to install or implement engineering or work practice controls.
- Gloves, hats, vented goggles, shoes or disposable shoe covers shall be provided at no cost. Protective clothing shall be clean and dry. Protective clothing shall be cleaned, laundered, repair and replaced as necessary and disposable clothing shall be identified and handled properly.

#### Medical Surveillance

- A baseline blood sample shall be obtained prior to any lead exposure.
- Employees who are or may be exposed above the Action Level for more than 30 days per year will be included in a medical surveillance program which is performed by or under the supervision of a licensed physician at no cost to the employee.
- Any employee with elevated blood levels shall be temporarily removed.
- Blood sampling and monitoring will occur at least every 6 months to each affected employee until two consecutive blood samples and analysis are acceptable.
- Employees shall be notified in writing within 5 days of blood sampling results when lead levels are not acceptable.
- Blood sampling shall occur on a monthly during a removal period of each employee removed from exposure to lead due to an elevated blood lead level.
- Whenever the results of a blood lead level test indicate that an employee's blood lead level exceeds the level for medical removal Waco, Inc. shall provide a second (follow-up) blood sampling test within two weeks after Waco, Inc. receives the results of the first blood sampling test.

#### Medical Removal

- Employees will be removed from exposure to lead when an exposure meets or exceeds the Action Level on each occasion that a periodic and follow-up blood sampling test indicates that blood lead level is at or above 60 μg/100 g of whole blood.
- An employee will be removed from exposure to lead when the average of the last three (3) blood sampling tests indicates the employee's blood level is at or above 50 μg/100 g of whole blood (the employee need not be removed if the last blood sampling test shows blood lead level to be at or below 40 μg/100 g of whole blood).
- If the employee's blood lead level does not decline adequately with 18 months of removal, the employee will be offered a medical examination to determine if the employee may be returned to his or her former job status.
- Medical Removal Protection requirements of 1910.1025(k)(2) shall be followed.

#### Recordkeeping

- Medical surveillance records shall be maintained for 30 years after termination of employment.
- Exposure monitoring records shall be maintained for 30 years after completion of the project.

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• Exposure and medical monitoring records shall be made available to affected employees or their representatives and to regulatory agencies upon request.

#### Training

Training shall be provided to employees who have the potential to exposure of lead prior to the time of initial assignment and annually thereafter. All affected employees are required to attend training programs. Training will include the following:

- Distribute a copy of the content of the lead standard and Appendices A and B of the regulation and it's readily availability for employees
- Content of any compliance plan in effect
- Access to information and training records
- Specific operations where lead exposure is or could result in being above the action level
- Engineering controls and work practices associated with the job
- Purpose, proper selection, fitting, use, and limitations of respirators
- Purpose and description of the medical surveillance program, which will include potential health effects, (including there could be adverse effects on reproductive systems) and the medical removal program
- Instructions to employees that chelating agents should not routinely be used to remove lead from their bodies and should not be used at all except under the direction of a licensed physician;

Training records shall be provided upon request all materials relating to the employee information and training program to regulatory agencies.

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#### Purpose

The purpose of this program is to establish procedures for affixing appropriate lockout/tagout equipment to energy isolating devices and to otherwise disable machines or equipment to prevent unexpected energization, start up or release of stored energy to prevent injury or incident.

#### Scope

This program covers the servicing and maintenance of machines and equipment where the unexpected energization or startup of the machine or equipment, or the release of stored energy could cause an incident. This program establishes minimum performance requirements for the control of such hazardous energy. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers Waco, Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

#### Definitions

Affected employee - An employee whose job requires them to operate or use a machine or equipment on which servicing and maintenance is being performed under lockout/tagout, or whose job requires the employee to work in an area in which such servicing or maintenance is being performed.

Authorized employee - A person that performs lockout/tagout procedures on machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes authorized when that employee's duties include performing servicing or maintenance covered under this program.

Capable of being locked out - An energy isolating device is capable of being locked out if it has a hasp or other means of attachment to which, or through which, a lock can be affixed, or it has a locking mechanism built into it. Other energy isolating devices are capable of being locked out if lockout can be achieved without the need to dismantle, rebuild or replace the energy isolating device or permanently alter its energy control capability.

Energized - Connected to an energy source or containing residual or stored energy.

Energy isolating device - A mechanical device that physically prevents the transmission or release of energy including, but not limited to, the following:

- A manually operated electrical circuit breaker, a disconnect switch, a manually operated switch by which the conductors and no pole can be operated independently, a line valve, a block and any similar device used to block or isolate energy.
- Push buttons, selector switches and other control circuit type devices are not isolating devices.

Lockout - The placement of a lockout device on an energy isolating device in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

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Lockout device - A device that utilizes a positive means, such as either a key or combination type lock, to hold an energy isolating device in the safe position and prevent the energizing of a machine or equipment. Included are blank flanges and bolted slip blinds.

Normal operation - The utilization of a machine or equipment to perform its intended operation.

Potential Energy Sources - Any source of gas, electrical, mechanical, hydraulic, pneumatic, chemical, gravity, steam, thermal, tension or other energy sources.

Servicing and/or maintenance - Workplace activities such as constructing, setting up, adjusting, inspecting, modifying and maintaining and/or servicing machines and equipment, where the employee may be exposed to an unexpected energization or startup of the equipment or release of a hazardous energy source.

Setting up - Any work performed to prepare a machine or equipment for performing its normal operation.

Tagout - The placement of a tagout device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout device - A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until tagout device is removed.

#### **Key Responsibilities**

#### Managers and Supervisors

- Responsible to control and enforce this plan and to see that all their employees and contractors that are affected by lockout/tagout procedures, have the knowledge and understanding required for safe application, usage, and removal of all energy controls and devices.
- Ensure employees are trained and comply with the requirements of this program.

#### Employees

- Employees who are affected by this program are required to attend training on an annual basis.
- Are required to follow the provisions of this program.

#### Procedure

#### General

Only an authorized employee or employees performing the servicing or maintenance shall perform lockout or tagout.

#### Devices

Lockout Device - If an energy source can be locked out a device that utilizes a lock to hold an energy isolating device in a safe position shall be used. Each site shall have the same type of lock as specified by Waco, Inc..

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Tagout Device – If an energy source cannot be locked out with a lockout device then a tagout device shall be used. Tagout devices are a warning only level of protection and shall be weather and chemical resistant, standardized in color with clear written warning of hazardous energy; i.e. Do Not Operate, Do Not Start, Do Not Energize, etc. Each site shall have the same style of tags specified by Waco, Inc..

#### Specific Energy Control Procedures

Each manager or supervisor is responsible for developing specific step-by-step shutdown and startup procedures for a particular machine or piece of equipment in their respective area.

- A written, step-by-step isolation procedure for shutdown and startup shall be prepared for each type of machine or piece of equipment.
- This procedure shall include:
  - Equipment number if assigned.
  - Equipment location.
  - Energy Source(s) (i.e. electrical, hydraulic, gas pressure, etc.)
  - Location of isolating controls (i.e. breaker switches, valves, etc.)
  - o Quantity of isolating controls
  - Quantity of locks required to isolate the equipment
  - Other hardware required to isolate the equipment (i.e. chains, valve covers, blocks, etc.)
  - List any residual energy required to be dissipated before work begins.

#### Specific Sequence for Application of Energy Control

#### 1. Notification

Authorized employees must notify all other affected employees of the application and removal of lockout/tagout devices. Notification shall be given before the controls are applied and before they are removed from the machine or equipment.

#### 2. Preparation for Shutdown

Before an authorized or affected employee turns off a machine or equipment, the authorized employee shall have knowledge of the type and magnitude of the energy, the hazards of the energy to be controlled and the methods or means to control the energy.

#### 3. Machine or Equipment Shutdown

The machine or equipment shall be turned off or shutdown using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.

#### 4. Machine or Equipment Isolation

All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located and operated in such a manner as to isolate the machine or equipment from the energy source.

#### 5. Lockout/Tagout Devices and Application

• Each authorized employee shall have the proper number of locks and devices to be able to perform proper lockout/tagout procedures for machines or equipment that they may be working on.

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- Lockout or tagout devices shall be affixed to each energy isolating device by authorized employees.
- Lockout and tagout devices shall include name of individual placing device. Devices shall indicate the identity of the employee applying the device.
- Lockout devices shall be affixed in a manner to hold the energy isolating devices in a safe or off position.
- Tagout devices shall be affixed in a manner that will clearly indicate that the operation or movement of isolating devices from the safe or off position.
- Tagout devices used with energy isolating devices with the capability of being locked out shall be fastened at the same point at which the lock would have been attached. If a tag cannot be directly attached to the energy isolation device it shall be located as close as safely as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device.
- Each energy source shall be locked out completely isolating the equipment.
- Isolating machines or equipment shall include, but are not limited to:
  - Pumps, compressors, generators, electric distribution, storage tanks, etc.
  - Each type of equipment to be isolated shall have specific procedures for isolation, i.e. for compressors: suction, discharge, power, starting, fuel, dumps shall be closed, locked and tagged out properly. The blow-down valve shall be opened, locked and tagged out properly. (NOTE): If compressor has a side stream hooked up, the side stream shall be closed, locked and tagged out properly.

#### 6. Stored Energy and the Possibility of Reaccumulation

Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained and otherwise rendered safe.

If there is a possibility of re-accumulation of stored energy, verification of isolation shall be continued until the servicing or maintenance operation is completed, or until the possibility of such accumulation no longer exists.

#### 7. Verification of Isolation

Prior to starting work on machines or equipment that have been locked or tagged out; the authorized employee shall verify that isolation and deenergization of the machine or equipment have been accomplished.

#### Procedures for Handling Multiple Groups of Workers Involved in a Group Lockout

A crew of authorized employees may use a group lockout or tagout device. This will afford the group of employees a level of protection equal to that provided by a personal lockout or tagout device. Procedures include:

- A tailgate meeting shall be conducted to review the lockout procedures and other information as required for safe work to continue all crafts and effected departments shall be involved.
- An authorized employee will isolate the equipment and ascertain the exposure status of individual group members.
- All workers will then place their individual locks on the device's group lockout or tagout device after they have verified the procedure.
- An authorized employee has primary responsibility for a set number of employees working under the protection of a group lockout or tagout device. The authorized employee should ascertain the exposure status of individual group members. Each Waco, Inc. employee or contractor shall attach a personal lockout or tagout device to the group's device while he/she is working and then removes it when finished.

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- During shift change or personnel changes, there are specific procedures to ensure the continuity of lockout or tagout procedures. These include:
  - In the event shift or personnel changes occur during maintenance and/or repair activities, the designated Waco, Inc. employee in charge shall take the necessary steps to maintain the continuity of the lockout/tagout protection. This includes maintaining that all provisions in this procedure are adhered to and the transfer of lockout/tagout devices between authorized employees is accomplished.
  - No work shall be allowed to proceed following personnel or shift change unless these requirements are met. The job supervisor must observe that all personnel or shift change locks or tags are properly transferred during the process.
  - Before the last outgoing person is allowed to leave they must remove their lock (or warning tag) and the incoming Waco, Inc. person shall affix their lock or (warning tag) to prevent the lock out device or tag warning device from ever not being locked or warning if a lock out device is not practicable.
  - This also applies to all group lockout tagout situations.
  - o This also applies to all contract personnel working on Waco, Inc. or client projects.
  - If any outgoing person leaves the site and their lock/tag is still attached then follow Removal of Locks guidelines below.

#### Release from Lockout/Tagout

When servicing or maintenance is completed or when Lockout / Tagout devices must be temporarily removed, the equipment requires testing and the machine or equipment is ready for testing or to return to normal operating conditions, the following steps shall be taken, in this order:

- Check the machine or equipment and the immediate area surrounding the machine or equipment to ensure that all nonessential items such as tools have been removed and that the machine or equipment components are operationally intact.
- Check the work area to ensure that all personnel have been safely positioned or removed from the area.
- Remove the Lockout/Tagout device
- Energize and proceed with testing
- Deenergize and reapply control methods including Lockout / Tagout devices
- Document the procedure by use of the completed isolation log and provide to supervisor for filing.

#### **Removal of Locks**

The authorized employee who applied the lock shall be the one to remove their lock. However, after all work has been completed, certain conditions may arise which prohibit this person from being present to remove the lock.

The following procedures shall be followed to allow for the removal of a lock that another person has applied:

- Every effort shall be made to contact the authorized employee who applied the lock to obtain the key(s).
- If the key(s) cannot be made available, the employee who requests removal of the lock shall contact their supervisor.
- The supervisor shall verify that every effort was made to contact the original authorized employee who applied the lock and to obtain the key(s).

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- The employee removing the lock shall note on the Service Report that the lock(s) were removed with permission by supervisor.
- All reasonable efforts will be made by supervisor to notify that employee their lock has been removed, ensuring that the authorized employee has this knowledge before they return to work.
- If the equipment is client owned, the supervisor or employee requesting to remove the lock(s) shall contact the client to get the lock removed. Clients must remove their lock(s).
- NOTE: Waco, Inc. employees shall not remove any client locks.

#### Contractors

Contractors performing lockout procedures on Waco, Inc. property shall comply with this procedure. Contractors shall supply their own locks. Waco, Inc. shall initially lockout Waco, Inc. machines and equipment before the contractor will be allowed to apply their own lock in addition to the Waco, Inc.'s.

#### Periodic Inspections of the Energy Control Procedure

Periodic inspections of the energy control procedure are conducted and documented at least annually to ensure procedures and requirements are being followed. Periodic inspections of the energy control procedure must be conducted at least annually to ensure that the procedure is being followed.

The Waco, Inc. Safety Manager or their designee performs the inspection (it must be someone other than those actually using the lockout/tagout in progress). The inspector will produce a certified review of the inspection including date, equipment, employees and the inspection shall be documented. They will verify that:

- Each authorized and/or affected employee has been trained as required.
- Any new equipment added has specific lockout procedures developed and documented.
- Current procedures are adequate for performing complete isolation of equipment and resulting in a zero energy state.
- A copy of the audit maintained on file at the managers/supervisors office.

#### **EMPLOYEE TRAINING**

The training must include recognition of hazardous energy source, type and magnitude of energy available, methods and means necessary for energy isolation and control.

Each authorized employee shall receive adequate training.

All affected employees are instructed in the purpose and use of the energy control procedure.

Any other employees whose work operations are or may be in an area where energy control procedures may be utilized are instructed in the purpose and use of the energy control procedure.

Additional training includes:

- The purpose and use of energy control procedures.
- When tagout systems are used, employees shall also be trained in the following limitations of tags:

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- Tags are essentially warning devices affixed to energy isolating devices, and do not provide the physical restraint on those devices that is provided by a lock.
- When a tag is attached to an energy isolating means, it is not to be removed without authorization of the authorized person responsible for it, and it is never to be bypassed, ignored, or otherwise defeated in any way.
- Tags must be legible and understandable by all authorized employees, affected employees, and all other employees whose work operations are or may be in the area, in order to be effective.
- Tags and their means of attachment must be made of materials which will withstand the environmental conditions encountered in the workplace.
- Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.
- Tags may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program.

#### <u>Retraining</u>

Retraining shall be conducted whenever a periodic inspection reveals, or whenever Waco, Inc. has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.

Retraining is required when there is a change in job assignments, in machines, a change in the energy control procedures, or a new hazard is introduced.

The retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary.

#### Training Documentation

Waco, Inc. shall certify that employee training has been accomplished and is being kept up to date. All training and/or retraining must be documented, signed and certified.

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#### SPECIFIC EQUIPMENT LOCKOUT PROCEDURES

Department\_\_\_\_\_

Equipment No.\_\_\_\_\_

Energy Source\_\_\_\_\_

Procedure for Shutdown and Isolation:

(List number of steps required to isolate machine or equipment - write N/A on lines not used or add additional steps if necessary)

	STEP NO.
	1
	2
	3
	4
	5
	6
	7
	8
	9
	10
	Additional Information:
Prepared By:	Date:

(This procedure to be communicated to all authorized and affected employees and kept on file at location of machine or equipment)

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SAMPLE TAG

# WARNING

## MINIMUM LOCK/OUT – TAG/OUT PROCEDURES

Inlet Suction Block Valve Discharge Block Valve Fuel Gas Valve Start Gas Valve Liquid Dump Line Blow Down (Lock Open)

When working on this compressor package the following items must be LOCKED OUT & TAGGED OUT. Residual pressure must be blown down. Open all valves on surge bottles and piping to relieve any pressure that may be trapped.

## Side Stream (For Units Set up with Side Streams)

When working on the compressor each person must lock and tag the compressor package!

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#### **ISOLATION LOG**

Date of Isolation:

Description of Work:

List of Equipment out of Service:

Necessary Requirements of Clear Isolation:

Au	thorized Employee S	ignature: _			
Pei	rson Continuing Wor	k Signature: _			
		Locks/Tags for	GROUP LOCKOUT or Mi	ultiple Locks/Tags	
	Lock # or Tag	Date Installed	Date Removed	Print Name (for Group Lockout)	Signature

(If additional space is needed, please attach an additional page)

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#### ANNUAL AUDIT OF THE CONTROL OF HAZARDOUS ENERGY PROGRAM

I certify that an audit of the Waco, Inc. "Control of Hazardous Energy" Program was conducted and that each employee has been trained in the recognition and procedures to lockout equipment they may be required to work on or may be affected by.

I further acknowledge that the current procedure is adequate to safely lockout equipment in this department for servicing and maintenance.

Department: \_\_\_\_\_

Manager (or representative): \_\_\_\_\_

Date: \_\_\_\_\_

Original to file: \_\_\_\_\_

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### Purpose

This program is written to be in compliance with local regulatory requirements and provide directives to managers, supervisors, and employees about their responsibilities in the operations and management of WACO, INC. mobile equipment.

### **Key Responsibilities**

### WACO, INC. Safety Manager

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

#### Site Manager

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

#### Employees

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

### **Mobile Equipment**

The following requirements apply for all WACO, INC. locations:

WACO, INC. must develop and implement safe work procedures for the use of powered mobile equipment in the workplace and must train workers in those safe work procedures.

The equipment operator of mobile equipment shall be directly responsible for the safe operation of that equipment and shall comply with all laws and regulations governing the operation of the equipment.

Maintenance records for any service, repair or modification which affects the safe performance of the equipment must be maintained and be reasonably available to the operator and maintenance personnel during work hours

All mobile equipment shall be maintained in safe operating condition and operation, inspection, repair, maintenance and modification shall be carried out in accordance with manufacturer's instructions or, in the absence of the instructions, in accordance with good engineering practice.

Servicing, maintenance and repair of mobile equipment shall be done when the equipment is not in operation, except that equipment in operation may be serviced if the continued operation is essential to the process and a safe means is provided.

Only authorized employees shall be allowed to operate mobile equipment. Authorization to operate mobile equipment will be issued to employees qualifying under appropriate training and proficiency testing. The person must also have in possession of an applicable operator's license and an airbrake certificate where required and be

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familiar with the operating instructions pertaining to the equipment and be authorized to operate the equipment. Authorization will be issued on after these requirements are met.

A supervisor must not knowingly operate or permit a worker to operate mobile equipment which is, or could create, an undue hazard to the health or safety of any person or is in violation of any local or federal regulations.

Mobile equipment in which the operator cannot directly or by mirror or other effective device see immediately behind the machine must have an automatic audible warning device which activates whenever the equipment controls are positioned to move the equipment in reverse, and if practicable, is audible above the ambient noise level.

Unauthorized personnel shall not be permitted to ride on equipment unless it is equipped to accommodate riders safely.

At the beginning of each shift, the operator shall inspect and check the assigned equipment, reporting immediately to his/her supervisor any malfunction of the clutch or of the braking system, steering, lighting, or control system and locking/tagging out the equipment if necessary.

The operator shall immediately report defects and conditions affecting or likely to affect the safe operation of the equipment to his or her immediate supervisor or other authorized person and confirm this by a written report as soon as possible. If an inspection of powered mobile equipment identifies a defect or unsafe condition that is hazardous or may create a risk to the safety or health of a worker WACO, INC. must ensure that the powered mobile equipment is not operated until the defect is adjusted, repaired or the unsafe condition is corrected.

The operator of mobile equipment must not leave the controls unattended unless the equipment has been secured against inadvertent movement such as by setting the parking brake, placing the transmission in the manufacturer's specified park position and by chocking wheels where necessary.

No operator shall leave unattended a suspended load, machine or part or extension of it unless it has been immobilized and secured against inadvertent movement.

Powered equipment shall not be left unattended unless forks, buckets, blades and similar parts are in the lowered position or solidly supported.

Before a worker starts any powered mobile equipment WACO, INC. shall ensure that the worker makes a complete 360 degree visual inspection of the equipment and the surrounding area to ensure that no worker, including the operator, is endangered by the startup of the equipment. No worker shall start any powered mobile equipment until the inspection is completed.

All powered mobile equipment is inspected by a competent person for defects and unsafe conditions as often as is necessary to ensure that it is capable of safe operation. A written record of the inspections, repairs and maintenance carried out on the powered mobile equipment is kept at the workplace and made readily available to the operator of the equipment. As soon as is reasonably practicable the defect must be repaired or the unsafe condition is corrected.

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All mobile equipment shall be equipped with a working signal alarm for backing up. The operator shall make sure the warning signal is operating when the equipment is backing up.

The operator shall use access provided to get on or off of equipment. Do not jump to the ground.

No operator shall operate mobile equipment without the protection of an enclosed cab or approved eye protection for the type of hazards to the eye.

Where there is a danger to the operator of a unit of powered mobile equipment or any other worker who is required or permitted to be in or on a unit of powered mobile equipment from a falling object or projectile WACO, INC. requires that the powered mobile equipment is equipped with a suitable and adequate cab, screen or guard.

Every forklift will be equipped with a seat belt for the operator if the forklift is equipped with a seat and the operator of a forklift is required to use the seat-belt. Before starting the engine, the driver shall fasten seat belts and adjust them for a proper fit.

Each mobile equipment vehicle used for lifting must be provided with a durable and clearly legible load rating chart that is readily available to the operator. The operator shall not load the vehicle/equipment beyond its established load limit and shall not move loads which because of the length, width, or height that have not been centered and secured for safe transportation.

Mobile equipment used for lifting or hoisting or similar operations shall have a permanently affixed notation stating the safe working load capacity of the equipment and the notation must be kept legible and clearly visible to the operator.

The operator shall not use, or attempt to use any vehicle in any manner or for any purpose other than for which it is designated.

The operator's manual for powered mobile equipment must be readily available to a worker who operates the equipment.

An employer must ensure that a competent person services, inspects, disassembles and reassembles a tire or tire and wheel assembly of powered mobile equipment in accordance with the specifications of both the tire manufacturer and the manufacturer of the powered mobile equipment.

All mobile equipment must be equipped with (a) an audible warning signal; (b) a means of illuminating the path of travel at any time and tail lights when, because of insufficient light or unfavorable atmospheric conditions, (c) adequate illumination of the cab and instruments; and (d) a mirror providing the operator with an undistorted reflected view to the rear of the mobile equipment.

Adequate and approved fire suppression equipment shall be provided on mobile equipment.

The operator of a gasoline or diesel vehicle shall shut off the engine before filling the fuel tank and shall see that the nozzle of the filling hose makes contact with the filling neck of the tank. No one shall be on the vehicle during

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fuelling operations except as specifically required by design. There shall be no smoking or open flames in the immediate area during fuelling operation.

When a worker is required to work beneath elevated parts of mobile equipment including trucks, the elevated parts shall be securely blocked.

Materials and equipment being transported shall be loaded and secured in a manner to prevent movement which could create a hazard to workers or another person. This includes keeping the cab, floor and deck of mobile equipment free of material, tools or other objects which could create a tripping hazard, interfere with the operation of controls or be a hazard to the operator or other occupants in the event of an accident.

Where the operator of a vehicle, mobile equipment, crane or similar material handling equipment does not have a full view of the intended path of travel of the vehicle, mobile equipment, crane or similar material handling equipment or its load, the vehicle, mobile equipment, crane or similar material handling equipment shall only be operated as directed by a signaler who is a competent person.

The signaler shall be stationed, in full view of the operator and with a full view of the intended path of travel of the vehicle, mobile equipment, crane or similar material handling equipment and its load; and clear of the intended path of travel of the vehicle, mobile equipment, crane or similar material handling equipment and its load.

Where a vehicle, crane or similar equipment is operated near a live power line carrying electricity at more than 750 volts, every part of the equipment shall be kept at least the minimum distance from the live power line for the particular voltage as required by local or federal law.

Under no circumstance will a worker be directed, required or permitted to work under or remain in the range of a swinging load or part of unit of powered mobile equipment due to the inherent danger.

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## Purpose

The purpose of this program is to set forth procedures for the safe use of electrical equipment, tools, and to comply with NFPA 70E requirements.

### Scope

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

WACO, INC. shall advise the host employer of:

- Any unique hazards presented by the contract employer's work,
- Any unanticipated hazards found during work by WACO, INC. that the host employer did not mention, and
- The measures WACO, INC. took to correct any hazards reported by the host employer to prevent such hazards from recurring in the future.
- An audit must be performed every year to ensure the requirements in this written program are being performed by the employees. This written program must be updated if auditing determines that employees are not following it or if another issue is identified with potential hazardous exposure.

### Responsibilities

### Managers/Supervisor

The HSE Manager will develop electrical safety programs and procedures in accordance with OSHA requirements and/or as indicated by events and circumstances.

Operations Managers and Supervisors are responsible for ensuring that only qualified employees and or qualified contractors perform electrical repairs or installations. Unqualified persons shall not be permitted to enter spaces that are required to be accessible to qualified employees only, unless the electric conductors and equipment involved are in an electrically safe work condition.

Operations Managers and Supervisors shall ensure a documented job briefing is held before starting each job and will include all employees involved. The briefing will cover hazards associated with the job, work procedures involved, special precautions, energy source controls and PPE requirements.

Operations Managers are also responsible for ensuring all applicable electrical safety programs are implemented and maintained at their locations.

Employees are responsible to use electrical equipment, tools, and appliances according to this program, for attending required training sessions when directed to do so and to report unsafe conditions to their supervisor immediately.

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Only qualified employees may work on electric circuit parts or equipment that has not been de-energized. Such employees shall be made familiar with the use of special precautionary techniques, PPE, insulating and shielding materials and insulated tools.

## Safe Work Practices

Prior to any work being done within the Limited Approach Boundary a hazard risk analysis shall be performed. The analysis shall contain event severity, frequency, probability and avoidance to determine the level of safe practices employed.

## Safe Work Practices for Working within the Limited Approach Boundary

The limited approach boundary is the distance from an exposed live part within which a shock hazard exists.

The restricted approach boundary is the closest distance to exposed live parts a qualified person can approach with without proper PPE and tools. Inside this boundary, accidental movement can put a part of the body or conductive tools in contact with live parts or inside the prohibited approach boundary. To cross the restricted approach boundary, the qualified person must:

- Have an energized work permit that is approved by the supervisor or manager responsible or the safety plan.
- Use PPE suitable for working near exposed lived parts and rated for the voltage and energy level involved.
- Be certain that no part of the body enters the prohibited space.
- Minimize the risk from unintended movement, by keeping as much of the body as possible out of the restricted space; body parts in the restricted space should be protected.

The prohibited approach boundary is the minimum approach distance to exposed live parts to prevent flashover or arcing. Approaching any closer is comparable to making direct contact with a live part. To cross the prohibited approach boundary, the qualified person must:

- Have specified training to work on exposed live parts.
- Have a permit with proper written work procedures and justifying the need to work that close.
- Do a risk analysis.
- Have (2) and (3) approved by the appropriate supervisor.
- Use PPE appropriate for working near exposed live parts and rated for the voltage and energy level involved.

The Flash Protection Boundary is the approach limit at a distance from exposed live parts within which a person could receive a second degree burn if an electrical arc flash were to occur.

- Use PPE appropriate for working near exposed live parts and rated for the voltage and energy level involved.
- For systems of 600 volts and less, the flash protection boundary is 4 feet, based on an available bolted fault current of 50 kA and a clearing time of 6 cycles for the circuit breaker to act, or any combination of fault currents and clearing times not exceeding 300 kA cycles.
- When working on de-energized parts and inside the flash protection boundary for nearby live exposed parts If the parts cannot be de-energized, use barriers such as insulated blankets to protect against accidental contact or wear proper PPE.

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Arc Flash Hazard Analysis

An arc flash hazard analysis includes the following:

- Collect data on the facility's power distribution system.
  - Arrangement of components on a one-line drawing with nameplate specifications of every device.
  - Lengths and cross-section area of all cables.
- Contact the electric utility for information including the minimum and maximum fault currents that can be expected at the entrance to the facility.
- Conduct a short circuit analysis followed by a coordination study is performed.
- Feed the resultant data into the NFPA 70E equations.
  - These equations produce the necessary flash protection boundary distances and incident energy to determine the minimum PPE requirement.
  - The flash protection boundary is the distance at which PPE is needed to prevent incurable burns (2nd degree or worse) if an arc flash occurs. (It is still possible to suffer 1st or 2nd degree burns.)
- For systems of 600 volts and less, the flash protection boundary is 4 feet, based on an available bolted fault current of 50 kA (kiloamps) and a clearing time of 6 cycles (0.1 seconds) for the circuit breaker to act, or any combination of fault currents and clearing times not exceeding 300 kA cycles (5000 ampere seconds).

When working on de-energized the parts, but still inside the flash protection boundary for nearby live exposed parts:

- If the parts cannot be de-energized, barriers such as insulated blankets must be used to protect against accidental contact or PPE must be worn.
- Employees shall not reach blindly into areas that might contain exposed live parts.
- Employees shall not enter spaces containing live parts unless illumination is provided that allows the work to be performed safely.
- Conductive articles of jewelry and clothing (such as watchbands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread, metal headgear, or metal frame glasses) shall not be worn where they present an electrical contact hazard with exposed live parts.
- Conductive materials, tools, and equipment that are in contact with any part of an employee's body shall be handled in a manner that prevents accidental contact with live parts. Such materials and equipment include, but are not limited to long conductive objects such as ducts, pipes, tubes, conductive hose and rope, metal-lined rules and scales, steel tapes, pulling lines, metal scaffold parts, structural members, and chains.
- When an employee works in a confined space or enclosed spaces (such as a manhole or vault) that contains exposed live parts, the employee shall use protective shields, barriers or insulating materials as necessary to avoid contact with these parts. Doors, hinged panels, and the like shall be secured to prevent them from swinging into employees. Refer to the confined space entry program.

## Inspections

- Electrical equipment, tools, and appliances must be inspected prior to each use.
- The use of a hard fixed GFCI or a portable GFCI adapter shall be used with all portable hand tools, electric extension cords, drop lights and all 110 volt equipment.

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- Faulty equipment, tools, or appliances shall be removed from service immediately and tagged "Out of Service", dated and signed by the employee applying the tag.
- Alerting techniques include safety signs and tags, barricades, and attendants. Safety signs much meet the requirements of applicable state, federal, or local codes and standards. Barricades must be used in conjunction with safety signs and never by themselves. Any technique used must not increase the potential for employee injury.

### Equipment

Test instruments, equipment, and their accessories shall meet the requirements of ANSI/ISA-61010-1-Safety Requirements for Electrical Equipment for Measurement, Control, and Laboratory Use Part 1 General Requirements, for rating and design requirements for voltage measurement and test instruments intended for use on electrical systems 1000 Volts and below.

When test instruments are used for the testing for the absence of voltage on conductors or circuit parts operating at 50 volts or more, the operation of the test instrument shall be verified before and after an absence of voltage test is performed.

### Personal Protective Equipment

All PPE used must meet requirements found in applicable laws and regulations. These PPE requirements apply to many different kinds of PPE: arc rated apparel, insulating aprons, general eye and face protection, arc rated face protection, fall protection, testing methods and specifications for footwear, glove and sleeve testing and care, hard hats, arc rated rainwear, visual inspections of rubber protective products and sleeves.

All insulating PPE must be inspected before each day's use and immediately following any incident that can reasonably be suspected of having caused damage. Insulating gloves shall be given an air test, along with the inspection.

Maximum test intervals for rubber insulating personal protective equipment shall include:

- Blankets-before first issue/every 12 months thereafter
- Gloves-before first issue and every 6 months
- Sleevers before first issue and every 12 months
- Covers and line hose shall be testing if insulating value is suspect.

### **Energized Electrical Work Permit**

Work on energized electrical conductors or circuit parts that are not placed in an electrically safe work condition shall be considered energized electrical work and shall be performed by written permit only.

### Lighting

Employees shall not enter spaces containing electrical hazards unless illumination is provided that enables the employees to perform the work safely. Where lack of illumination or an obstruction precludes observation of the work to be performed employees shall not perform any task within the Limited Approach Boundary of energized electrical conductors or circuit parts operating at 50 volts or more or where an electrical hazard exists.

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## **Extension Cords**

- Use only three-wire, grounded, extension cords and cables that conform to a hard service rating of 14 amperes or higher, and grounding of the tools or equipment being supplied.
- Only commercial or industrial rated-grounded extension cords may be used in shops and outdoors.
- Cords for use other than indoor appliances must have a rating of at least 14 amps.
- Cords must have suitable strain relief provisions at both the plug the receptacle ends.
- Work lamps (drop light) used to power electrical tools must have a 3 wire, grounded outlet, unless powering insulated tools.
- Adapters that allow three wire, grounded prongs, connected to two wire non-grounded outlets are strictly prohibited.
- Cords must have a service rating for hard or extra-hard service and have S, AJ, ST, SO, SJO, SJT, STO, or SJTO printed on the cord.
- Cords may not be run through doorways, under mats or carpets, across walkways or aisles, concealed behind walls, ceilings or floors, or run through holes in walls, or anywhere where they can become a tripping hazard.
- High current equipment or appliances should be plugged directly into a wall outlet whenever possible.
  - All extension cords shall be plugged into one of the following:
  - A GFCI outlet;
  - A GFCI built into the cord;
  - A GFCI adapter used between the wall outlet and cord plug.
- All extension cords and or electrical cords shall be inspected daily or before each use, for breaks, plug condition and ground lugs, possible internal breaks, and any other damage. If damage is found, the extension cord or electrical cord shall be remove from service and repaired or replaced.
- Extension cords shall not be used on compressor skid to operated heat tapes or any other type of equipment on a temporary basis. Heat tapes or other equipment shall be hard wired per applicable electrical codes.

### Outlets

• Outlets connected to circuits with different voltages must use a design such that the attachment plugs on the circuits are not interchangeable.

### Multiple Outlet Boxes

- Multiple outlet boxes must be plugged into a wall receptacle.
- Multiple outlet boxes must not be used to provide power to microwave ovens, toasters, space heaters, hot plates, coffeepots, or other high-current loads.

### Double Insulated Tools

- Double insulated tools must have the factory label intact indicating the tool has been approved to be used without a three wire grounded supply cord connection.
- Double insulated tools must not be altered in any way, which would negate the factory rating.

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### Switches, circuit breakers, and disconnects

- All electrical equipment and tools must have an on and off switch and may not be turned on or off by plugging or unplugging the supply cord at the power outlet.
- Circuit breaker panel boxes and disconnects must be labeled with the voltage rating.
- Each breaker within a breaker panel must be labeled for the service it provides.
- Disconnect switches providing power for individual equipment must be labeled accordingly.

### Ladders

- Only approved, non-conductive ladders, may be used when working near or with electrical equipment, which includes changing light bulbs.
- Ladders must be either constructed of wood, fiberglass, or have non-conductive side rails.
- Wood ladders should not be painted, which can hide defects, except with clear lacquer.
- When using ladders they shall be free from any moisture, oils, and greases.

### Energized and Overhead High Voltage Power Lines & Equipment

- A minimum clearance of 10 feet from high voltage lines must be maintained when operating vehicular and mechanical equipment such as forklifts, cranes, winch trucks, and other similar equipment.
- When possible, power lines shall be de-energized and grounded or other protective measures shall be provided before work is started.
- Minimum approach distance to energized high power voltages lines for unqualified employees is 10 feet.
- Minimum approach distance for qualified employees shall be followed per 29 CFR 1910.333(c)(3)(i) Qualified – Table S5 Selection and Use of Work Practices - Approach Distances for Qualified Employees – Alternating Current).

### Confined or Enclosed Work Spaces

- When an employee works in a confined or enclosed space that contains exposed energized parts, the
  employee shall isolate the energy source and turn off the source and lock and tag out the energy source
  (Only qualified electricians can work on an exposed energy source).
- Protective shields, protective barriers or insulating materials as necessary shall be provided.

### Enclosures, Breaker Panels, and Distribution Rooms

- A clear working space must be maintained in the front, back and on each side of all electrical enclosures and around electrical equipment for a safe operation and to permit access for maintenance and alteration.
- A minimum two-foot working floor space in front of panels and enclosures shall be painted yellow.
- Employees may not enter spaces containing exposed energized parts unless illumination is provided that enables the employees to work safely.
- Housekeeping in distribution rooms must receive high priority to provide a safe working and walking area in front of panels and to keep combustible materials to the minimum required to perform maintenance operations.
- All enclosures and distribution rooms must have "Danger: High Voltage Authorized Personnel Only" posted on the front panel and on entrance doors.
- Flammable materials are strictly prohibited inside distribution rooms (Boxes, rags, cleaning fluids, etc.)

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## Lock Out/Tag Out

- No work shall be performed on (or near enough to them for employees to be exposed due to the dangers of tools or other equipment coming into contact with the live parts) live parts and the hazards they present.
- If any employee is exposed to contact with parts of fixed electric equipment or circuits which have been deenergized, the circuits energizing the parts shall be locked out or tagged or both.
- Conductors and parts of electrical equipment that have been de-energized but not been locked or tagged out shall be treated as live parts.
- Per WACO, INC. policy all electrical will be outsourced and performed only by qualified and licensed
  electrical contractors who are familiar with the use of special precautionary techniques, PPE, insulating
  and shielding materials and insulated tools. Any equipment being made ready for maintenance will be
  locked out using WACO, INC.'s Control of Hazardous Energy Lock Out/Tag Out Program. Lockouts are
  performed by the HSE Manager, Shop Foreman or Branch Manager. Designated employees in some
  branches may be trained by local management to lock out equipment. If live sources are to be worked it
  will only be performed with the knowledge of local management. Only certified electricians may work on
  electric circuit parts or equipment.
- Only authorized personnel may perform lock out/tag out work on electrical equipment and will follow WACO, INC.'s Control of Hazardous Energy Lock out/Tag Out Program.
- Authorized personnel will be trained in lock out/tag out procedures.
- Affected personnel will be notified when lock out/tag out activities are being performed in their work area.

## Contractors

- Only approved, certified, electrical contractors may perform construction and service work on WACO, INC. or client property.
- It is the Manager/Supervisors responsibility to verify the contractor's certification.

## Fire Extinguishers

- Approved fire extinguishers must be provided near electrical breaker panels and distribution centers.
- Water type extinguishers shall not be located closer than 50 feet from electrical equipment.

## **Electric Shock-CPR:**

- If someone is discovered that has received an electric shock and is unconscious, first check to see if their body is in contact with an electrical circuit. Do not touch a person until you are sure there is no contact with an electrical circuit.
- When it is safe to make contact with the victim, begin CPR if the person's heart has stopped or they are not breathing.
- Call for help immediately.

## **Electric Welders**

• A disconnecting means shall be provided in the supply circuit for each motor-generator arc welder, and for each AC transformer and DC rectifier arc welder which is not equipped with a disconnect mounted as an integral part of the welder.

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• A switch or circuit breaker shall be provided by which each resistance welder and its control equipment can be isolated from the supply circuit. The ampere rating of this disconnecting means may not be less than the supply conductor ampacity.

## **Equipment Grounding**

- All gas compressors, air compressors, separators, vessels, etc. shall be grounded by means of using a lug and ground strap, nominal in size to a ½" bolt or larger, attached to a ground rod six feet or longer.
- Equipment bonding jumpers shall be of copper or other corrosion-resistance material.
- The transfer of hazardous or flammable material from a metal or plastic container with a flash point of 100 degrees F or less shall have a ground strap from the container and attached to the skid or a ground rod placed in the ground.

### Training

Employees are trained to understand the specific hazards associated with electrical energy. Employees shall be trained in safety-related work practices and procedural requirements as necessary to provide protection from the electrical hazards associated with their respective jobs. Employees shall be trained to identify and understand the relationship between electrical hazards and possible injury.

Employees shall be trained in the skills and techniques to distinguish exposed energized electrical conductors and circuit parts from other parts of electrical equipment, to determine the nominal voltage of exposed energized electrical conductors and circuit parts, the approach distances specified in Table 130.2 (below), and the decision making process necessary to determine the degree and extent of the hazard and the personal protective equipment and job planning necessary to perform the task safely.

		Limited Approad	h Boundary	
Nominal system voltage range, phase to phase	Exposed movable conductor	Exposed fixed- circuit part	Restricted approach boundary (allowing for accidental movement)	Prohibited approach boundary
0 to 50 volts	Not specified	Not specified	Not specified	Not specified
51 to 300 volts	10 ft. 0 in.	3 ft. 6 in.	Avoid contact	Avoid contact
301 to 750 volts	10 ft. 0 in.	3 ft. 6 in.	1 ft. 0 in.	0 ft. 1 in.
751 to 15 KV KV	10 ft. 0 in.	5 ft. 0 in.	2 ft. 2 in.	0 ft. 7 in.
15.1 kV to 36 KV	10 ft. 0 in.	6 ft. 0 in	2 ft. 7 in.	0 ft. 10 in.
36.1 KV to 46 kV	10 ft. 0 in.	8 ft. 0 in	2 ft 9 in.	1 ft. 5 in.
46.1 KV to 72.5 KV	10 ft. 0 in.	8 ft. 0 in.	3 ft 2 in.	2 ft. 1 in.
72.6 KV to 121 KV	10 ft. 8 in.	8 ft. 0 in.	3 ft. 3 in.	2 ft. 8 in.
138 to 145	11 ft 0 in	10 ft. 0 in.	3 ft. 7 in	3 ft. 1 in.
161 KV to 169 KV	11 ft 8 in.	11 ft. 8 in.	4 ft. 0 in.	3 ft. 6 in.
230 KV to 242 KV	13 ft. 0 in.	13 ft. 0 in.	5 ft. 3 in.	4 ft. 9 in.
345 KV to 262 KV	15 ft. 4 in	15 ft. 4 in.	8ft. 6 in.	8 ft. 0 in.

Employees shall be trained in safety related work practices that pertain to their respective job assignments.

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Safe work practices shall be employed to prevent electric shock or other injuries resulting for either direct or indirect electrical contacts when work is performed near or on equipment or circuits which are or may be energized.

Training shall be documented and maintained for the duration of the employee's employment. Documentation shall be made when the employee demonstrates proficiency, be maintained for the duration of the employee's employment, and contain each employee's name and date of training.

## Retraining

- An employee shall receive additional training (or retraining) under any of the following conditions:
  - (1) If the supervision or annual inspections indicate that the employee is not complying with the safety-related work practices; (2) If new technology, new types of equipment, or changes in procedures necessitate the use of safety-related work practices that are different from those that the employee would normally use; or (3) If he or she must employ safety-related work practices that are not normally used during his or her regular job.
- Retraining shall be performed at intervals not to exceed 3 years.

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### Purpose

The purpose of this program is to provide a process to minimize employee-hearing loss caused by excessive occupational exposure to noise.

### Scope

This program is applicable to all employees who may be exposed to noise in excess of 85 decibels (decibels). When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers Waco, Inc. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

### Definitions

Audiometric testing - means detection by the person being tested of a series of pure tones. For each tone, the person indicates the lowest level of intensity that they are able to perceive.

Decibels – means the sound energy measured by a sound level meter using the "A" scale. The "A" scale is electronically weighted to simulate the response of the human ear to high and low frequency noise.

Slow Response – means the setting on the sound level meter that averages out impulses of brief duration that would cause wide fluctuation in the sound level meter reading.

Standard Threshold Shift – means a change in hearing threshold relative to the baseline audiogram of an average of 10 dB (corrected for age) at 2000, 3000 and 4000 Hz in either ear.

### **Key Responsibilities**

#### **Managers and Supervisors**

- Ensure requirements of this program are established and maintained.
- Ensure employees are trained and comply with the requirements of this program.

#### **Employees**

Wear hearing protection when required, attend the training, and cooperate with testing and sampling.

#### Procedure

Occupational hearing loss is a cumulative result of repeated or continued absorption of sound energy by the ear; employee protection is based on reduction of the noise level at the ear or limiting the employee's exposure time. Waco, Inc. shall offer hearing protection to all employees exposed to potential high noise levels in working areas and to those employees requesting hearing protection.

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### Hearing Conservation Program

Waco, Inc. shall implement a hearing conservation program for employees exposed to sound levels 85dbA or greater. A continuing effective hearing conservation program shall be administered when employees are exposed to sound levels greater than 85 dbA on an 8 hour time-weighted average basis.

Employees will wear hearing protection in signed areas while on an owner client facility.

### Monitoring Procedures to be Used When Exposure Limits Exceed the Established Level

When information indicates that employee exposure may equal/exceed the 8 hour time-weighted average of 85 decibels, a monitoring program shall be implemented to identify employees to be included in the hearing conservation program.

### Surveys

Surveys will be conducted by a qualified employee or third party.

To evaluate noise exposure in terms of possible hearing damage, it is necessary to know the overall sound level ("A" scale measurement), the exposure time of the individual in hours per day and the length of time the individual has worked in the area being surveyed. This data shall be supplemented by the following:

- Name of area and location
- Date and time of survey
- Name of person conducting survey
- Description of instrument used, model and serial number
- Environmental conditions
- Description of people exposed

Waco, Inc. shall notify each employee of their monitoring results, or, if their job is exposed to noise 85 decibels or greater.

A plot of noise levels must be made for owned facilities. The plot must be filed or posted at the facility.

Waco, Inc. shall evaluate hearing protector attenuation for the specific noise environments in which the protector will be used. The adequacy of hearing PPE shall be reevaluated whenever noise exposures increase to the point that the PPE provided may no longer provide adequate protection. Waco, Inc. shall then provide more effective PPE where necessary.

All sound measuring equipment must be calibrated before and after each survey. Records of sound measuring equipment calibration and noise level surveys shall be kept for 20 years.

Noise Surveys must be repeated whenever changes in the workplace may expose additional personnel to high noise or hearing protection being used by employees may not be adequate to reduce the noise exposure to a level below 85 decibels.

### Sound Level Surveys

• All owned facilities that are suspected of having noise levels exceeding 85 decibels must be screened.

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Exposure Surveys:

- A representative sampling of employees shall be conducted to determine the exposure to noise over a period of time.
- Noise dosimeters must be capable of integrating all continuous, intermittent and impulsive sound levels from 80 dB to 130 dB and must be calibrated so a dose of 50% corresponds to a time weighted average of 85 dB.

## Signage

Clearly worded signs shall be posted at entrances to, or on the periphery of, areas where employees may be exposed to noise levels in excess of 85 decibels. These signs shall describe the hazards involved and the required protective actions.

### Audiometric Testing

Waco, Inc. must establish and maintain an audiometric testing program for all employees whose exposures equal or exceed the 8 hour time-weighted average of 85 dbA and making audiometric testing available to all employees whose exposures equal or exceed an 8 hour time-weighted average of 85 decibels.

### **Baseline Testing Guidelines**

- Waco, Inc. shall establish a baseline audiogram for each exposed employees within 6 months of their first exposure. Within 6 months of an employee's first exposure at or above the action level, a valid baseline audiogram shall be established against which future audiograms can be compared.
- When a mobile van is used the baseline shall be established within one year.
- A qualified third party shall perform all audiometric testing, evaluation, reporting and retesting.
- Prior to establishment of a baseline audiogram at least 14 hours without exposure to workplace noise is observed. Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protection may be used to meet the requirement. Employees shall also be notified to avoid high levels of noise.

### Annual Testing Guidelines

Waco, Inc. shall provide an annual audiogram and if a standard threshold shift has occurred the employee will be notified in writing within 21 days of determination. At least annually after obtaining the baseline audiogram, Waco, Inc. shall 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.

### Steps That Are Taken When Standard Threshold Shift Occurs

- Hearing protection shall be re-evaluated and/or refitted and,
- If necessary a medical evaluation may be required and
- The employee shall be advised to wear hearing protection and if necessary a reassignment of duties may be deemed appropriate.

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## Required Recordkeeping

Waco, Inc. shall maintain accurate records of all employee exposure measurements and all records are maintained as required by CFR 1910.95 (Occupational Noise Exposure).

Employee audiograms are considered medical/exposure records. These records must be kept for the length of employment plus 30 years.

### **Hearing Protection Devices**

- Hearing protectors are available to all employees exposed to an 8 hour time-weighted average of 85 decibels at no cost to the employee.
- Hearing protection shall be replaced as necessary.
- Waco, Inc. shall ensure that hearing protectors are worn. Employees shall be properly trained in the use, care and fitting of protectors. This is done at no cost to employees.
- Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by Waco, Inc..

### TRAINING

Employees must be provided with training on at least an annual basis and shall be updated to be consistent with changes in the PPE and work processes.

A training program shall be provided for all employees who are exposed to action level noise.

The training shall be repeated annually for each employee. Training shall be updated consistent to changes in PPE and work processes. Waco, Inc. shall make available to affected employees copies of the noise exposure procedures and shall also post a copy in the workplace. Waco, Inc. shall also allow the Assistant Secretary and the Director access to records.

All training must and shall be documented.

All staff shall have a copy of this program, noise exposure procedures and it shall be posted at the worksite and a copy made available to all employees and their representatives if applicable.

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### Purpose

Business continuity means ensuring that essential business functions can survive a natural disaster, technological failure, human error, or other disruption. Many existing business continuity plans anticipate disruptions such as fires, earthquakes, and floods. These events are restricted to certain geographic areas and the time frames are fairly well defined and limited. Pandemic disease, however, demands a different set of continuity assumptions since it will be widely dispersed geographically and potentially arrives in waves that could last several months at a time.

### Assignment of Ownership of the Pandemic Disease Plan

A pandemic disease plan or disease containment plan is developed for WACO, INC. and a coordinator appointed. We have identified a workplace coordinator who will be responsible for dealing with disease issues and their impact at the workplace. This may include contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals.

### Assumptions

A pandemic disease will spread rapidly and easily from person to person, affecting all businesses due to absenteeism. Businesses that are relied upon by other businesses will be facing the same massive absentee rates and will be unable to provide essential components to maintain the daily operations.

Risk assessments to identify the essential/critical components of our business operation need to be conducted. Recognize that a pandemic includes:

- Healthcare services not being available (they are already full at present with the usual ailments).
- Schools, churches and other public places not being open.
- Borders are partially or fully closed, especially airports, leaving people (our families, employees, business partners, customers and suppliers) "stranded".
- Essential materials and supplies may be limited due to distribution chains that are affected by the travel restrictions or absentee workers supporting those transportation means.
- Essential services around utilities, food distribution/access and banking systems may not be at "normal levels"; access to cash flow could be tight.
- People may not be willing to or able to come to work.

## Effective Internal/Employee Communication Procedure

Communications during a pandemic involves both internal communications and external communications. Internal communication will be provided to employees to educate them about pandemic diseases and measures they can take to be prepared.

Key contacts, a chain of communications and contact numbers for employees, and processes for tracking business and employee's status should be developed.

Risk communication is critical to inform employees regarding changes in the pandemic status. The following is one method for providing such information.

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**Alert:** conveys the highest level of importance; warrants immediate action or attention. **Advisory**: provides key information for a specific incident or situation; might not require immediate action. **Update:** provides updated information regarding an incident or situation; unlikely to require immediate action.

Provide continuous updates through internal & external communications when a pandemic is imminent:

- Notification to employees of operational changes
- Provide frequent updates about the pandemic status
- Provide advisories and alerts as conditions change
- Ensure vendors and suppliers have available a dedicated communications contact
- Monitor local, state, and federal pandemic updates

We will use our phone systems that can perform automatic dialing from a database with each employee contact number to send notifications and messages about alerts. The use of the WACO, INC. web-site also will serve as a portal for sharing information with employees and vendors.

### Effective External/Customer Communication Procedure

A procedure must be developed to notify key contacts including both customers and suppliers in the event an outbreak has impacted our ability to perform services. This procedure must also include notification to customers and suppliers when operations resume.

### **Business Continuity Planning**

Business continuity plans should be prepared so that if a large or significant absenteeism of personnel become ill or changes in business practices are required business operations can be effectively maintained.

### COMMAND STAFF:

Incident Commander (President/CEO)	Organizes and directs all aspects of the incident response
Public Information Officer	Creates and releases upon approval from the incident
(Media/Public Relations)	commander all information to the staff, media and public.
Liaison Officer	Establishes and maintains relationships with outside
(Vice President)	organizations
Safety Officer (Safety Manager)	Ensures the safety of all persons involved with the pandemic

### **OPERATIONS SECTION:**

Operations Section Chief	Initiates	and	manages	ongoing	operations	throughout	а
(Director of Operations)	pandemi	С					

### LOGISTICS SECTION:

Logistics Section Chief	Meets the goods, services, and staffing needs of the operation
(Purchasing/Inventory Manager)	during the pandemic

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### PLANNING SECTION:

Planning Section Chief	Collects information and resources potentially relevant to the
(Lead Administrator)	pandemic and WACO, INC. operations

### FINANCE SECTION:

Finance Section Chief	Monitors all expenditures and ensures fiscal resource availability
(Purchasing/Accounting Manager)	during the pandemic

### Pandemic Response by Pandemic Phase

Currently the WHO has created various phases for a pandemic but does not always relate to events locally.

Level 0 (WHO Phase 3) - Novel virus alert- not human-to-human transmission Level 1 (WHO Phase 4) - Confirmed cases of human-to-human transmission of novel disease virus. Level 2 (WHO Phase 5) - Suspected/confirmed cases in the local area. Level 3 (WHO Phase 5) - Numerous suspected/confirmed cases in the local area.

## Work At Home or Stay at Home Policy

Flexible work policies should be developed as possible. Workers should be encouraged to stay at home when ill, when having to care for ill family members, or when caring for children when schools close, without fear of reprisal. Tele-commuting or other work-at-home strategies should be developed.

### Infection Control Measures

Guidelines for infection control are important to clarify the routes of transmission and the ways to interrupt transmission through measures of hygiene. Infection control is an essential component of pandemic management and a component of public health measures. Essential measures include:

- Hand washing and use of hand sanitizers should be encouraged by WACO, INC. supervision. Hand washing facilities, hand sanitizers, tissues, no touch trash cans, hand soap and disposable towels should be provided by WACO, INC.
- Workers are encouraged to obtain appropriate immunizations to help avoid disease. Granting time off work to obtain the vaccine will be considered when vaccines become available in the community.
- <u>Limiting large or crowded gatherings of personnel if an outbreak or increased level of disease is in</u> <u>progress</u> - Social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings should be considered.
- Equipment and/or working surfaces shall be cleaned periodically. Clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) periodically and when visibly soiled. Work surfaces should also be cleaned frequently using normal cleaning products.

Additional examples of infection control measures include:

- Stay at home when you are sick. If possible, stay away from work, school and from running errands. You will help others from catching your illness.
- Cover your coughs and sneeze into tissue, or cough into your shirt sleeve.

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- Enhance existing housekeeping service by wiping down and disinfecting work areas (i.e. keyboards, telephones, desks, etc.) frequently.
- Enhance housekeeping services for general public use areas several times throughout the work period.
- Use personal protective equipment where appropriate to minimize exposure (i.e. gloves- for handling money, masks- for ill employees)

### Implementation, Testing, and Revision of the Plan

The Pandemic Plan is reviewed and/or tested. The plan and emergency communication strategies should be periodically tested to ensure it is effective and workable.

Testing the plan will be accomplished by conducting exercises. Exercises range from low stress to full-scale, handson drills. A tabletop exercise is the easiest way to begin testing the plan. This type of exercise involves having discussions regarding a scenario that challenges the plan and the decision makers during an emergency. Functional exercises take on an additional level of complexity, in that they actually require participants to conduct functional components of the plan. This usually involves planning specific scenarios, creating pretend data and present issues that target an area within the plan to be tested.

Each of these methods of testing the plan requires extensive planning for the exercise and the evaluation. The evaluation is critical to revising the plan, by capturing actual responses during the exercise or drill objectively. Once this data is captured, an after-action report with recommendations to revising the plan should be completed within a few weeks of the exercise.

## Process for Implementing Lessons Learned Following a Pandemic Event

Following a pandemic event, the person responsible for implementation of the plan will identify learning opportunities and take action to implement any corrective actions.

A review of the plan's initiated actions completed will identify all action items that were taken versus and when the action items were to be completed via a gap analysis indicating when specific action items were to occur, and when actual completion dates were completed.

Input will be asked of our staff and management for what went well and what could be improved during the event. All findings that indicate where improvements can be made will be used as Lessons Learned process to modify this plan as required. Corrective actions will be assigned to specific management representatives as required. Implementation of the Lessons Learned will be communicated to all employees and a revised plan issued.

### Training

Employees will be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease, and when it is appropriate to return to work after illness. Disease containment plans and expectations should be shared with employees. Communicating information with non-English speaking employees or those with disabilities must be considered.

Documentation of all training is required.

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## Purpose

The purpose of the Personal Protective Equipment section is to set forth the procedures for the use, care, and maintenance of personal protective equipment required to be used by employees for the prevention of injuries.

### Scope

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

### **Key Responsibilities**

### HSE Manager

- Assists in the selection of appropriate PPE. If a task exposes an employee to hazards which cannot be
  eliminated through engineering or administrative controls, the HSE Manager assists the supervisor and
  project manager to identify and select PPE suitable for the specific task performed, conditions present,
  and frequency and duration of exposure. Employees need to give feedback to the supervisor about the
  fit, comfort, and suitability of the PPE being selected. Employees are provided reasons for selection of
  PPE.
- Assists supervisor and site managers in assuring all PPE obtained meets regulatory and this procedure's requirements.
- Performs Worksite Hazard Assessments The hazard assessment must indicate a determination if hazards are present or are likely to be present, which necessitate the use of PPE. Sources of hazards include, but are not limited to: hazards from impact/motion, high/low temperatures, chemicals, materials, radiation, falling objects, sharp objects, rolling or pinching objects, electrical hazards, and workplace layout. Certifies in writing the tasks evaluated, hazards found and PPE required to protect employees against hazards and ensures exposed employees are made aware of hazards and required PPE before they are assigned to the hazardous task. Certificate shall include certifier's name, signature, dates and identification of assessment documents.

### Managers and Supervisors

- Supervisors and managers shall regularly monitor employees for correct use and care of PPE, and obtain follow-up training if required to ensure each employee has adequate skill, knowledge, and ability to use PPE.
- Supervisors and managers shall enforce PPE safety rules following the guidance of the Waco, Inc. progressive disciplinary procedures and ensure Required PPE Poster is posted properly.

### Employees

- Complying with the correct use and care of PPE.
- Reporting changes in exposure to hazardous conditions that might require a follow-up assessment of the task for PPE.
- Reporting and replacing defective or damaged PPE, which shall not be used.
- Wearing of required PPE is a condition of employment.

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### Procedure

### General

Protective equipment, including personal protective equipment for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.

Employee-owned equipment is NOT permitted, except for safety toe footwear and prescription safety glasses. Waco, Inc. is still responsible for the assurance of its adequacy, maintenance and sanitation of those two items.

All PPE issued shall be at no cost to the employee. All employees will know and follow the procedures outlined in this Program.

### Eye Protection

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids or chemical gases or vapors. Eye and Face PPE must comply with ANSI Standard Z87.1-2003 (Z87+), Occupational and Educational Personal Eye and Face Protective Devices.

### Safety Glasses

Safety glasses, with side shields, that meet ANSI Z-87.1-2003 standards with "high Impact lenses" are required to be worn by all employees, subcontractors, and visitors while on Waco, Inc. property, at all times, as described below:

- At field locations, in shops and warehouses, except in approved, designated, striped safety zones.
- In all yard work zones or by everyone when in the vicinity of loading or unloading equipment, performing mechanic or maintenance work, test stand operations, operating equipment such as forklifts, welding, or any type of work which has the potential to inflict an eye injury.
- In any office, restroom, or any other building while performing any type of work where a potential eye injury may be present.
- Visitors will be provided with visitor glasses. In the absence of approved prescription safety glasses, "Over the glass" type safety glasses or goggles, must be worn over the nonsafety glasses until approved prescription safety glasses are obtained.
- Workers assisting welders must wear absorbent safety glasses that protect the wearer from ultra-violet (UV) and/or infrared rays (IR).
- Dark shaded lens (sunglasses) darker than a # 1 shade is prohibited to be worn indoors unless welding or assisting a welder.
- A doctor must support "exceptions for medical reasons" in writing to exempt safety eyewear requirements.
- Safety glasses are not required:
  - o Inside offices.
  - Parking lots when traveling from vehicles to and from office buildings by way of main doors that do not pass through shops.

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### Goggles

- Chemical splash proof goggles shall be worn when handling or mixing liquid chemicals, solvents, paints, etc., and/or as recommended on the Material Safety Data Sheet of the material being handled.
- Dust proof goggles shall be worn when blowing equipment down with air or while performing other jobs where safety glasses are not adequate to prevent airborne particles from entering the openings around the lenses and side shields.

### Face Shields

• Full face shields shall be worn over safety glasses when operating hand held or stationery grinders with abrasive or wire wheels, while chipping paint or concrete or, performing jobs where there is the potential for flying objects striking the face and safety glasses or goggles would not provide adequate protection.

### **Head Protection**

Employees must wear protective helmets when working in areas where there is a potential for injury to the head from employee initiated impact or impact from falling or other moving objects. Helmets must comply with ANSI Standard Z89.1-1997 Class E, *American National Standard for Industrial Head Protection* for Type II head protection or be equally effective.

- Employees must wear protective helmets when working in areas where there is a potential for injury to the head from falling objects.
- Hardhats are to be worn at all field, shop and warehouse locations, or where deemed necessary as per each location's PPE Hazard Assessment.
- Hardhats will not be altered in any way.
- Do not paint or apply unauthorized stickers, name plates, etc.
- Do not drill, cut, bend, or apply heat.
- Do not alter the suspension system.
- Hardhats will be inspected by the employee regularly for cracks, chips, scratches, signs of heat exposure (sun cracks), etc.
- Defective hardhats will be replaced immediately.
- Hardhats shall not be placed in rear windows of vehicles where they will be exposed to the sun or become projectiles during an accident.
- A supply of hardhats must be made available to visitors.
- Waco, Inc. shall provide hardhats.
- Employees will be trained in the use, care and maintenance of head protection equipment.

## **Hearing Protection**

Hearing protection is required to be worn by all employees, subcontractors, and visitors while in posted "High Noise" areas. Refer to the Waco, Inc. Hearing Conservation Program for more information.

Warning signs will be posted in areas known or suspected to have noise levels exceeding 85 dBA either constantly or intermittently.

When signs are not posted, employees shall wear hearing protection when noise caused by machinery, tools, etc., prevents normal conversations to be heard clearly.

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Rule of thumb: If you have to yell to be heard, hearing protection is required

## **Types**

- Molded Inserts (ear plugs)
- Canal Caps (head band type)
- Muff, either headband or hard hat mounted Earmuffs and earplugs shall be provided to the employee in sizes and configurations that will be comfortable to the employee.

### Care and Maintenance

- Inspect hearing protection prior to each use.
- Hearing protection must be kept clean to prevent ear infections.
- Most earplugs used today are disposable and must be discarded when they become dirty, greasy, or cracked.
- Earmuffs that have deteriorated foam inserts, cracked seals or are defective must be replaced.

### Fit

- Due to individual differences, not everyone can wear the same type of hearing protection. A variety of styles may have to be tried before one is found to be comfortable and provide adequate protection.
- Employees shall be instructed how to obtain the proper fit.

### Hand Protection

### <u>Gloves</u>

- Gloves are required to be worn when performing work, which may expose the hands to extreme temperatures, cuts and abrasions, or exposure to chemicals.
- Welding: Welding gloves made of leather or other heat resistant materials shall be worn when performing arc welding or oxy/gas cutting.
- Chemical: Impervious (chemical resistant) gloves shall be worn when handling chemicals that specify gloves as personal protection equipment when handling.
- Refer to the specific chemical's Material Safety Data Sheet for the correct glove type.
- Persons assigned to working with chemicals, i.e., solvent vats, shall be issued their own individual gloves for hygiene purposes.
- Leather: Leather gloves should be worn when working with sharp materials or when handling rigging equipment.
- Cloth: Cloth gloves should be worn when handling objects or materials, which could cause blisters, splinters, cuts, etc.
- Heat Resistant: Heat resistant gloves shall be worn when handling hot bearings, races, or other materials or objects that have been heated beyond ambient temperatures.
- Insulated: Insulated gloves shall be worn to prevent frostbite in extreme cold climates.
- Glove Inspections
  - o Gloves shall be inspected before each use for holes, tears, and worn areas.
  - Chemical gloves shall be periodically air tested for pinholes by twisting the cuff tightly, apply low air pressure to expand the glove, and then submersing in water to check for bubbles.
  - Defective gloves shall be discarded immediately. Exception: machinists are exempted from wearing gloves while working with rotating machinery.

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## **Foot Protection**

Safety footwear shall be worn by all employees with regularly assigned duties at field locations, in shops and warehouses.

- Office workers and visitors who enter these areas on an infrequent basis will not be required to wear foot protection provided they stay clear of the work being performed.
- If required to be in the close proximity of the work, the work will be stopped while visiting the area or safety footwear will be worn.
- Shops, Field Locations, Warehouses and Parts Departments: Leather or equivalent boots, either lace up or pull up, shall be worn.
- The boot must provide ankle protection and have soles designed to protect from punctures with defined heels for climbing ladders.
- Metatarsal guards will be worn when duties present a hazard of equipment or material crushing the foot.
- All safety footwear must meet ANSI Z41-1999 standards.
- Client locations may require safety footwear to be worn by everyone; check with the local supervisor for client requirements before visiting field locations.

### **Fall Protection**

Personal fall protection is required when performing certain elevated jobs in excess of six feet. Consult the Waco, Inc. Fall Protection Program.

### **Electrical Protection**

Consult the Waco, Inc. Electrical Safety Program.

### Worksite Hazard Assessment

A written hazard assessment shall be performed. During the hazard assessment a determination if hazards are present or are likely to be present, this necessitates the use of PPE. The following sample hazard sources will be identified:

- High or low temperatures; Chemical exposures (use MSDS for guidance)
- Flying particles, molten metal or other eye, face, or skin hazards
- Falling objects or potential for dropping objects; employee falling from a height of 6' or more
- Sharp objects; Rolling or pinching that could crush the hands or feet;
- Electrical hazards

Where these hazards could cause injury to employees, personal protective equipment must be selected to substantially eliminate the injury potential. Employees will be notified for the selection and reason.

The results of this assessment shall be communicated to each affected employee and kept at the local office.

Selected/identified PPE shall be fitted to each affected employee. Fitting, including proper donning, doffing, clean and maintenance of PPE is addressed in the Training section. Exemptions for use of PPE must be supported by the PPE hazard assessment.

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### Monitoring

Supervisors and site managers monitor worksite tasks for changes in, or the introduction of new hazards. If new hazards are discovered, they advise the HSE Manager who then conducts a hazard assessment for appropriate PPE. The HSE Manager monitors the effectiveness of the PPE Procedure and makes recommendations to management to improve the procedure.

## Training

Employees who require or may need to wear PPE shall be properly trained and PPE must be fitted to each affected employee. Training shall include:

- When PPE is necessary.
- What PPE is necessary.
- How to properly don, doff, adjust and wear PPE.
- The limitations of PPE.
- Useful life and disposal of PPE.
- How to clean and maintain PPE in a sanitary and reliable condition.
- Reporting and replacing defective or damaged PPE, which shall NOT be used.

### Retraining

Retraining is required when:

- The workplace changes, making the previous training obsolete.
- The type of PPE changes.
- When the employee demonstrates lack of use, improper use, or insufficient skill or understanding in PPE selection, necessity, use and limitations.

### Documentation

Training shall be documented and records kept at the local office. The training certification shall include:

- Name of employee(s) trained;
- The dates of training; and
- The certification subject.

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-	1 = Mandatory – = Not Ma	ert Location or Work Site datory unless hazards become present E HAZARD ASSESSMENT CHANGE ALL AS NEEDED		Job/Task	Field Tech Housekeeping Shop Work Driving Office Winter Conditions
CATEGORY	EQUIPMENT	HAZARD	INSPECTION	MAINTENANCE	
Head Protection:					
	Hard Hat (Class G or E Only)	Striking Head or Falling Objects	Each use	Dispose	D
Eye and Face Protection:		· · · · · · · · · · · · · · · · · · ·			
	Safety Glasses w/shields	Objects Striking Eyes	Each use	Dispose	D D M * - M
	Impact Vented Goggles	Small Particles in Eyes	Each use	Dispose	D D
	Chemical Splash Goggles	Chemicals or Oil in Eyes	Each use	Dispose	D D D
Hearing Protection:					
	Disposable Earplugs	Damage to Hearing (85 dB)	Each use	Dispose	D D D
	Ear Muffs (w/Disposables)	Damage to Hearing (105 dB)	Each use	Dispose	D D D
Personal Protective Clothing:					
	Cold Weather Clothing	Cold Temperature	Each use	Clean & Repair	DDDD-D
	Rainwear	Wet body	Each use	Dispose	D
	Protective Sleeves	Biohazardous materials	Each use	Dispose	- M
	High Visibility Apparel	Injury to Body	Each use	Clean & Repair	M M M - M
	Insert more or delete as needed				
Foot Protection:					
	Slip Resistant Footwear	Injury to Body	Each use	Replace	M M M
	Anti-Slip Cleats during Winter	Injury to Body	Each use	Dispose	M M M M
Hand Protection:					
	Anti-cut Gloves	Cuts	Each use	Dispose	M D M
	Vinyl Disposable Gloves	Biohazardous materials	Each use	Dispose	- M
	Heavy Duty Gloves	Injuries to Hands	Each use	Dispose	M
	Cold weather Gloves	Environmental Exposure	Each use	Dispose	M
	Rubber Gloves	Hot Water Burns	Each use	Dispose	M

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		PPE Hazard Asse	ssment Certification Fo	orm		
Name of work place:				Conducted by Nam	ne/Signature:	
				Date of assess	ment:	
		(Use a separate shee	et for each job/task or work area	a)		
EYES						
Work activities, such as:		Work-related exposu	re to:	Can hazard be elimina	ited without the use o	f PPE?
abrasive blasting		🗌 airborne dust		Yes 🗌 No 🗌		
chopping		dirt		If no, use:	With:	
				Safety glasses	<u></u>	
		flying particles/ob	ojects	Safety goggles	Face :	shield
welding		blood splashes	h	Dust-tight goggles		
soldering		hazardous liquid o		Impact goggles		
torch brazing		chemical splashes		Welding helmet/s	hield	
working outdoors		molten metal spla		Chemical goggles		
computer work		glare/high intensi	ty lights	Chemical splash g	oggles	
punch press operations other:		laser operations		Laser goggles		
		hot sparks		Shading/Filter (#	)	
		other:		Welding shield		
				Other:		
FACE						
Work activities, such as:		Work-related exposu	re to:		ited without the use o	f PPE?
cleaning		hazardous liquid o	chemicals	Yes 🗌 No 🗌		
cooking		🔲 extreme heat		If no, use:		
siphoning		extreme cold		$\Box$ Face shield		
painting		potential irritants		Shading/Filter (#	)	
dip tank operations		other:		Welding shield		
metal pouring				Other:		
other:						

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HEAD		
Work activities, such as:         building maintenance         confined space operations         construction         electrical wiring         walking/working under catwalks         walking/working on catwalks         walking/working under conveyor belts         working with/around conveyor belts         walking/working under crane loads         other:	Work-related exposure to: beams pipes exposed electrical wiring or components falling objects fixed object machine parts other:	Can hazard be eliminated without the use of PPE?         Yes       No         If no, use:
HANDS/ARMS          Work activities, such as:         baking         cooking         grinding         welding         working with glass         using power tools         using computers         working outdoors         using knives         dental and health care services         garbage disposal         computer work         other:	Work-related exposure to:         blood         irritating chemicals         tools or materials that could scrape or cut         extreme heat         extreme cold         animal bites         electric shock         vibration         musculoskeletal disorders         sharps injury         other:	Can hazard be eliminated without the use of PPE?         Yes       No         If no, use:

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FEET/LEGS		
Work activities, such as: building maintenance construction demolition food processing foundry work working outdoors logging plumbing trenching use of highly flammable materials welding other:	Work-related exposure to:         explosive atmospheres         explosives         exposed electrical wiring or components         heavy equipment         slippery surfaces         impact from objects         pinch points         crushing         slippery/wet surface         sharps injury         blood         chemical splash         chemical penetration         extreme heat/cold         fall         other:	Can hazard be eliminated without the use of PPE?         Yes       No         If no, use:
BODY/SKIN		
Work activities such as: baking or frying battery charging dip tank operations fiberglass installation sawing other:	Work-related exposure to: chemical splashes extreme heat extreme cold sharp or rough edges irritating chemicals other:	Can hazard be eliminated without the use of PPE?         Yes       No         If no, use:       With:         Vest, Jacket       Long sleeves         Coveralls, Body suit       Aaingear         Apron       Welding leathers         Abrasion/cut resistance       Other:

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BODY/WHOLE		
Work activities such as:	Work-related exposure to:	Can hazard be eliminated without the use of PPE?
building maintenance	working from heights of 10 feet or more	Yes No
construction	impact from flying objects	
	impact from moving vehicles	If no, use: With:
computer work	sharps injury	Fall Arrest/Restraint Hood
working outdoors	l blood	Traffic vest Full sleeves
utility work	electrical/static discharge	Static coats/overalls
other:	hot metal	Flame resistant jacket/pants
	musculoskeletal disorders	Insulated jacket
	sparks	Cut resistant sleeves/wristlets
	Chemicals	Hoists/lifts
	extreme heat/cold	ergonomic equipment:
	elevated walking/working surface	Other:
	working near water	
	injury from slip/trip/fall	
	other:	
LUNGS/RESPIRATORY		
Work activities such as:	Work-related exposure to:	Can hazard be eliminated without the use of PPE?
Cleaning	dust or particulate	Yes 🗌 No 🗌
mixing	toxic gas/vapor	
painting	chemical irritants (acids)	If no, use: With/Type:
fiberglass installation	welding fume	Dust mask
compressed air or gas operations	asbestos	Disposable particulate respirator
confined space work	pesticides	Replaceable filter particulate w/cartridge
floor installation	organic vapors	half faced
ceiling repair	oxygen deficient environment	🗌 full face
working outdoors	paint spray	PAPR (Air recycle)
other:	extreme heat/cold	PPSA (Air supply)
	other:	

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EARS/HEARING			
Work activities such as:		Work-related exposure to:	Can hazard be eliminated without the use of PPE?
generator	grinding	loud noises	Yes 🗌 No 🗌
ventilation fans	machining	loud work environment	
motors	routers	noisy machines/tools	lf no, use:
sanding	sawing	punch or brake presses	ear muffs
pneumatic equipment	sparks	other:	ear plugs
punch or brake presses			leather welding hood
use of conveyors			
other:			

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The purpose of Process Safety Management is to prevent or minimize consequences of catastrophic releases of toxic, reactive, flammable or explosive chemicals in various industries such as refineries, etc.

WACO, INC. is required to recognize and participate as a contract employer at client locations with PSM Programs in place. WACO, INC. as a contractor has certain obligations to fulfill in order to comply with established PSM programs. Contract employer responsibilities are as follows:

- WACO, INC. has a responsibility (as the contractor) to train all employees necessary to perform their job. WACO, INC. shall assure that each contract employee is trained in the work practices necessary to safely perform his/her job.
- WACO, INC. (the contract employer) shall assure that each contract employee is instructed in the known potential fire, explosion or toxic release hazards related to his/her job and the process and the applicable provisions of the emergency action plan. WACO, INC. shall assure that each contract employee is instructed in the known potential fire, explosion, or toxic release hazards related to his/her job and the process, and the applicable provisions of the emergency action plan.
- Training shall be documented. Records which contain the identity of the contract employee, the date of training and the means used to verify that the employee understood the training must be maintained.
- Employee Evaluation Program All employees will be evaluated to ensure required training, participation and knowledge of the client's PSM requirements are completed and documented.
- WACO, INC. shall assure that each contract employee follows the safety rules of the facility including the safe work practices required with 1910.119(f)(4).
- WACO, INC. (the contract employer) shall advise the host employer of any hazards found or unique hazards presented by the contract employer's work. WACO, INC. shall advise the host employer of any unique hazards presented by the contract employer's work, or of any hazards found by the contract employer's work.
- Trade secret information and confidentiality of trade secret information All contract employers must respect the confidentiality of trade secret information when the process safety information is released to them.

## Process Safety Information

WACO, INC. employees shall participate in all as directed client PSM requirements, including:

- Employee Participation;
- Process Hazards Analysis (PHA)
- Training /Employee Evaluation
- Pre-Startup Safety Review (PSSR)
- Hot Work Permits
- Incident Investigation
- Compliance Audits

- Process Safety Information (PSI)
- **Operating Procedures**
- Contractors
- Mechanical Integrity
- Management of Change (MOC)
- Emergency Planning and Response
  - Trade Secrets

# WACO, INC. Duties

The host employer's safe work practices must be followed during operation such as lockout/tagout, confined space entry, opening process equipment or piping and control over entrance to facility. WACO, INC. employees shall abide by the host employers safe work practices during operations such as lockout/tagout, confined space entry, opening process equipment or piping and controls over entrance to facility.

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To comply with 1910.119(f)(4) WACO, INC. employees are required to complete all required documentation for any permit-required activities.

Hot work permits and hot work shall not be performed until hot work permit is obtained from the employer. Contract employees shall not perform hot work until a hot work permit is obtained from host employer. The permit shall document that the fire prevention and protection requirements in have been implemented prior to beginning the hot work operations.

In the event WACO, INC. becomes the sole operator of a facility, the existing PSM Program for that facility may be amended and adopted or, in the absence of a PSM Program, an assessment will be required prior to assuming operating responsibilities.

### **Reporting Incidents and Near Misses**

WACO, INC. employees must immediately report all accidents, injuries and near misses. An incident investigation shall be initiated within 48 hours. Resolutions and corrective actions must be documented and maintained 5 years.

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## Purpose

It is the intention of Waco, Inc. to provide a respirator protection program that meets or exceeds all federal standards. Waco, Inc. will attempt to engineer potential harmful vapors and oxygen deficient atmosphere exposure hazards out of the work environment. If engineering control measures are not feasible or during emergency situations with high exposure then respirators shall be provided which are applicable and suitable for purpose intended.

## Scope

This program applies to all Waco, Inc. projects and operations.

## **Respiratory Program Administrator**

Overall responsibility for the respiratory protection program is assigned to the Waco, Inc. Safety Manager in order to ensure that specific requirements are followed.

The Administrator must be knowledgeable of the complexity of the program, able to conduct evaluations and have the proper training.

This assignment is made, however, with the understanding that individual supervisors will have to implement and enforce major portions of the program. It is understood that the Program Administrator will report performance problems to the appropriate manager for resolution. The person who will have responsibility for administering all the aspects of this program will be the Project Manager or their designee.

The responsibilities of the Program Administrator will include, but are not limited to:

- Conducting an annual written evaluation of the program. The program evaluation should be completed no later than December, 31, of each year.
- Ensuring an adequate supply of respirators, cartridges, and repair/replacement parts. The Program Administrator may delegate this duty but will retain overall responsibility. The person(s) to whom this duty has been delegated is the Project Manager and/or Field Supervisor.
- Identifying hazards and ensuring only NIOSH certified respirators must be selected and provided based on those hazards and factors affecting performance.
- Ensuring that all respirator users have been trained in the use, selection and limitations of the type of respirators they will be using prior to the first time the respirator must be used. While the duty of conducting the training may be delegated, the Program Administrator retains final responsibility for seeing that all employees are appropriately trained.
- Ensuring that all respirator users have been medically evaluated and found fit to use the type of respirators that will be required in their job. The medical evaluation must be completed prior to assigning any employee to a task that requires use of a respirator.
- Ensuring that all respirator users are fit-tested at least annually and more often if other federal requirements apply.

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- Ensuring that respirators are individually issued, are cleaned and sanitized on a regular basis, and respirators are stored in a clean and accessible location. This duty may also be delegated but the Program Administrator retains final responsibility for seeing that it is done.
- Ensuring that respirators are selected based on the hazard that will be encountered. This program
  describes the basic respirators that will be used at this site and the tasks for which they will be required.
  In special circumstances, the Program Administrator will contact the corporate health and safety staff for
  guidance in selecting the correct respirator.
- Ensuring that employee exposure is monitored to assure correct respirator type is used. Exposure monitoring may be delegated to others; however, the Program Administrator has final responsibility of monitoring completion and to request assistance when necessary.
- Ensuring surveillance of employees who wear respirators shall leave the area to wash, change cartridges or if they detect break through or resistance.
- Ensuring that the elements of the Respiratory Protection Program for the selection, use, cleaning/maintenance, storage and fit-testing of respirators are followed.
- Ensuring that respirator parts are not exchanged between brands of respirators.
- Ensuring medical evaluations, respirators and required training are provided at no cost to the employee.

# **Medical Requirements**

#### General

Waco, Inc. shall provide a medical evaluation to determine the employee's ability to use a respirator, <u>before</u> the employee is fit tested or required to use the respirator in the workplace. Waco, Inc. may discontinue an employee's medical evaluations when the employee is no longer required to use a respirator.

#### Medical Evaluation Procedures

Waco, Inc. shall identify a physician or other licensed health care professional (PLHCP) to perform medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire. The medical evaluation shall obtain the information requested by the Medical Questionnaire in Forms section (or equivalent).

The medical evaluation prior to fit-testing will be confidential, conducted during normal working hours, be at a convenient time and location, be understandable and the employee will be given a chance to discuss the results with the PLHCP.

#### Supplemental Information for the PLHCP

The following information must be provided to the PLHCP before the PLHCP makes a recommendation concerning an employee's ability to use a respirator:

- The type and weight of the respirator to be used by the employee;
- The duration and frequency of respirator use (including use for rescue and escape);
- The expected physical work effort;
- Additional protective clothing and equipment to be worn; and
- Temperature and humidity extremes that may be encountered.

Waco, Inc. shall provide the PLHCP with a copy of the Waco, Inc. Respiratory Protection Program.

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Note: When Waco, Inc. replaces a PLHCP, Waco, Inc. must ensure that the new PLHCP obtains this information, either by providing the documents directly to the PLHCP or having the documents transferred from the former PLHCP to the new PLHCP. However, OSHA does not expect employers to have employees medically re-evaluated solely because a new PLHCP has been selected.

# **Medical Determination**

In determining the employee's ability to use a respirator, Waco, Inc. shall obtain a written recommendation regarding the employee's ability to use the respirator from the PLHCP. The recommendation shall provide only the following information:

- Any limitations on respirator use related to the medical condition of the employee, or relating to the workplace conditions in which the respirator will be used, including whether or not the employee is medically able to use the respirator;
- The need, if any, for follow-up medical evaluations; and
- A statement that the PLHCP has provided the employee with a copy of the PLHCP's written recommendation.

All recommendations are to be sent to Waco, Inc.'s Safety Manager.

# Additional Medical Evaluations

At a minimum, Waco, Inc. shall provide additional medical evaluations that comply with the requirements of this program if:

- An employee reports medical signs or symptoms that are related to ability to use a respirator;
- A PLHCP, supervisor, or the respirator Program Administrator informs Waco, Inc. that an employee needs to be re-evaluated;
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation; or
- A change occurs in workplace conditions (e.g., physical work effort, protective clothing, and temperature) that may result in a substantial increase in the physiological burden placed on an employee.

# Work Site Procedures

Each work site where respirators are required to protect the health of the worker shall have work site procedures that follow the guidelines of this program. Specific procedures may also be required by our client which will be followed. The following areas shall be included:

- Identification of specific hazard requiring respiratory protection
- The selection of the appropriate respiratory protection equipment based on the specific hazard and concentration levels, characteristics, etc. Specific brand and models of respiratory equipment to be used shall be identified in the procedures.
- Verification that each user of respiratory protection is qualified (medical approval, current fit test, annual training and demonstrates competency.

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# **Respirator Selection Criteria**

The selection of the respiratory equipment is based on the hazards the employee is exposed to. Waco, Inc. shall:

- Perform hazard identification,
- Select and provide respirators based on those hazards and factors affecting performance,
- Establish brands and models to be used, and
- Estimate exposures and contaminant information.

#### Hazard Identification

Due to the many varied work locations Waco, Inc.'s identification of respiratory hazards will be contained in the various work site specific safety plans. However, common respiratory hazards that will be encountered include:

- Dust
- Fumes
- Gases
- Chemical particles
- Oxygen Deficiency

# Characteristics of Hazardous Operation or Process

- Hot operations: welding, chemical reactions, soldering, melting, melding and burning
- Liquid operations: painting, degreasing, dipping, spraying, brushing, coating, etching, cleaning, pickling, plating, mixing, galvanizing and chemical reactions
- Solid operations: pouring, mixing, separations, extraction, crushing, conveying, loading, bagging and demolition.
- Pressurized spraying: cleaning parts, applying pesticides, degreasing, sand blasting and painting
- Shaping operations: cutting, grinding, filing, milling, melding, sawing and drilling

#### Gaseous Contaminants

- Inert gases (helium, argon, etc.), which do not metabolize in the body but displace air to produce an oxygen deficiency.
- Acid gases (SO2, H2S, HCl, etc.) which are acids or produce acids by reaction with water.
- Alkaline gases (NH3, etc.), which are alkalies or produce alkalies by reaction with water.
- Organic gases (butane, acetone, etc.), which exist as true gases or vapors from organic liquids.
- Organometallic gases (tetraethyl lead, organo-phosphates, etc.), which have metals attached to organic groups.

#### Particulate contaminants

- Dusts are mechanically generated solid particulates (0.5 to 10μm)
- Fumes are solid condensation particles of small diameter (0.1 to 1.0 μm)
- Mists are liquid particulate matter (5 to 100 μm)
- Smoke is chemically generated particulates (solid and liquid) of organic origins (0.01 to 0.3 μm)

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## **Selection of Respirator**

The following factors shall be taken into account when selecting the proper respirator:

#### Concentration and Type of Contaminant

The concentration and type of contaminant will determine the model and type of respirator and cartridges/filters or filters to be used. The concentration is based on a sampling of the atmosphere.

#### Location of Hazardous Area

(Confined Space, nearby contaminants, etc.)

#### <u>Worker Activity</u> (Extreme heat, cold, welding hood requirement, etc.)

#### Types of Respirators

*Air-purifying respirators* can be either full-face or half masks with mechanical or chemical cartridges to filter dusts, mists, fumes, vapors or gases.

*Powered air-purifying respirators* use a blower to pass the contaminated air through a filter. The purified air is then delivered into a mask or hood. They filter dusts, mists, fumes, vapors and gases, just like ordinary air-purifying respirators.

Air-purifying respirators cannot be used in oxygen-deficient atmospheres, which can result when another gas displaces the oxygen or consumption of oxygen by a chemical reaction occurs. Oxygen levels below 19.5% require either a source of supplied air or supplied-air respirator protection. Levels below 16% are considered to be unsafe and could cause death. To determine the proper cartridge for air-purifying respirators contact the Waco, Inc. Safety Manager or a qualified on-site safety representative of the client. You should also consult the Material Safety Data Sheet of the substance that needs to be filtered.

All cartridges are assigned a color designating the type of contaminant they will filter:

White:	Acid gas
Black:	Organic vapors
Green:	Ammonia gas
Yellow:	Acid gas and organic vapors
Purple:	Radioactive materials
Orange:	Dust, fumes and mists
Olive:	Other gases and vapors

Once the wearer of the respirator can detect an odor, irritation, or taste of the contaminant, the cartridge should be replaced. All cartridges and/or filters shall be changed at the beginning of each shift.

*Supplied-air respirators* provide the highest level of protection against highly toxic and unknown materials. Supplied air refers to self-contained breathing apparatuses (SCBAs) and air-line respirators. SCBAs have a limited air supply that is carried by the user, allowing for good mobility and fewer restrictions than air-line respirators.

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*Air-line respirators* have an air hose that is connected to a fresh air supply from a central source. The source can be from a compressed air cylinder or air compressor that provides at least Grade D breathing air.

*Emergency Escape Breathing Apparatuses* (EEBAs) provide oxygen for 5, 10 or 15 minutes depending on the unit. These are for emergency situations in which an employee must escape from environments immediately dangerous to life or health (IDLH).

#### SCBA (Self Contained Breathing Apparatus)

Waco, Inc. does NOT allow employees to work in an Immediately Dangerous to Life and Health (IDLH) environment.

In order to maintain the NIOSH/MSHA approval of any respirator, mixing parts from other respirator manufacturers is prohibited. This includes airline hoses, valves, gaskets, cartridges, etc. For example, do not use North cartridges or valve gaskets with an MSA product.

#### Brand and Models

Waco, Inc. has selected North Safety as its NIOSH-certified respirator. Only this brand of respirator shall be used in compliance with the conditions of the certification of its Respiratory Protection Program (fit testing model, no mixing of different manufacturer parts, cartridges, filters, etc.).

The specific model will be based on the hazard, concentration of contaminant, oxygen level, work environment and type of work being performed. To aid in the selection process the following will be used to identify the proper North respiratory equipment for the work being performed and hazard that is present.

- NIOSH Pocket Guide to Chemicals
- North Cartridge Selection Guide
- North Respirator Selection Guide

# Estimate of Exposures and Contaminant Information

- No employee shall enter an IDLH environment.
- Normal oxygen levels shall be maintained.
- No employee shall be exposed to an atmosphere containing concentrations that would exceed the STEL or PEL for the identified atmospheric hazard.

# **Respirator Fit Testing**

Before an employee may be required to use any respirator with a negative or positive pressure tight-fitting face piece, the employee must be fit tested with the same make, model, style, and size of respirator that will be used. This section specifies the kinds of fit tests allowed, the procedures for conducting them, and how the results of the fit tests must be used.

All respirator users are fit-tested at least annually and more often if other federal requirements apply.

Supplied Air Respirators are required to be fit tested as well.

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Waco, Inc. shall ensure that employees using a tight-fitting face piece respirator pass an appropriate qualitative fit test (QLFT) or quantitative fit test (QNFT) as stated in this program.

Waco, Inc. shall ensure that an employee using a tight-fitting face piece respirator is fit tested prior to initial use of the respirator, whenever a different respirator face piece (size, style, model or make) is used, and at least annually thereafter.

Waco, Inc. shall conduct an additional fit test whenever the employee reports, or Waco, Inc.'s PLHCP, supervisor, or Program Administrator makes visual observations of, changes in the employee's physical condition that could affect respirator fit. Such conditions include, but are not limited to, facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

If after passing a QLFT or QNFT, the employee subsequently notifies Waco, Inc., Program Administrator, supervisor, or PLHCP that the fit of the respirator is unacceptable, the employee shall be given a reasonable opportunity to select a different respirator face piece and to be retested.

The fit test shall be administered using an OSHA-accepted QLFT or QNFT protocol. The OSHA-accepted QLFT and QNFT protocols and procedures are contained in this section.

QLFT may only be used to fit test negative pressure air-purifying respirators that must achieve a fit factor of 100 or less. Half face air filtering respirators may be fit tested with irritant smoke while full face air filtering respirators require Portacount fit testing.

If the fit factor, as determined through an OSHA-accepted QNFT protocol, is equal to or greater than 100 for tight-fitting half face pieces, or equal to or greater than 500 for tight-fitting full face pieces, the QNFT has been passed with that respirator.

Fit testing of tight-fitting atmosphere-supplying respirators and tight-fitting powered air-purifying respirators shall be accomplished by performing quantitative or qualitative fit testing in <u>the negative pressure mode</u>, regardless of the mode of operation (negative or positive pressure) that is used for respiratory protection.

Qualitative fit testing of these respirators shall be accomplished by temporarily converting the respirator user's actual face piece into a negative pressure respirator with appropriate filters, or by using an identical negative pressure air-purifying respirator face piece with the same sealing surfaces as a surrogate for the atmosphere-supplying or powered air-purifying respirator face piece.

Quantitative fit testing of these respirators shall be accomplished by modifying the face piece to allow sampling inside the face piece in the breathing zone of the user, midway between the nose and mouth. This requirement shall be accomplished by installing a permanent sampling probe onto a surrogate face piece, or by using a sampling adapter designed to temporarily provide a means of sampling air from inside the face piece.

Any modifications to the respirator face piece for fit testing shall be completely removed, and the face piece restored to NIOSH-approved configuration, before that face piece can be used in the workplace.

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## **Fit Test Procedures**

The requirements in this section apply to all OSHA-accepted fit test methods, both QLFT and QNFT.

The test subject shall be allowed to pick the most acceptable respirator from a sufficient number of respirator sizes so that the respirator is acceptable to, and correctly fits, the user.

Prior to the selection process, the test subject shall be shown how to put on a respirator, how it should be positioned on the face, how to set strap tension and how to determine an acceptable fit. A mirror shall be available to assist the subject in evaluating the fit and positioning of the respirator. This instruction may not constitute the subject's formal training on respirator use, because it is only a review.

The test subject shall be informed that he/she is being asked to select the respirator that provides the most acceptable fit. Each respirator represents a different size and shape, and if fitted and used properly, will provide adequate protection.

The test subject shall be instructed to hold each chosen face piece up to the face and eliminate those that obviously do not give an acceptable fit.

The more acceptable face pieces are noted in case the one selected proves unacceptable; the most comfortable mask is donned and worn at least five minutes to assess comfort. Assistance in assessing comfort can be given by discussing the following points:

- If the test subject is not familiar with using a particular respirator, the test subject shall be directed to don the mask several times and to adjust the straps each time to become adept at setting proper tension on the straps.
- Position of the mask on the nose
- Room for eye protection
- Room to talk
- Position of mask on face and cheeks

The following criteria shall be used to help determine the adequacy of the respirator fit:

- Chin properly placed;
- Adequate strap tension, not overly tightened;
- Fit across nose bridge;
- Respirator of proper size to span distance from nose to chin;
- Tendency of respirator to slip;
- Self-observation in mirror to evaluate fit and respirator position.

Use the Fit Test form.

#### **User Seal Check**

Before conducting the negative and positive pressure checks, the subject shall be told to seat the mask on the face by moving the head from side-to-side and up and down slowly while taking in a few slow deep breaths. The test subject shall conduct a user seal check, either the negative or positive pressure seal checks described below:

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# Positive Pressure Check

Close off the exhalation valve and exhale gently into the face piece. The face fit is considered satisfactory if a slight positive pressure can be built up inside the face piece without any evidence of outward leakage of air at the seal. For most respirators this method of leak testing requires the wearer to first remove the exhalation valve cover before closing off the exhalation valve and then carefully replacing it after the test.

#### Negative Pressure Check

Close off the inlet opening of the canister or cartridge(s) by covering with the palm of the hand(s) or by replacing the filter seal(s), inhale gently so that the face piece collapses slightly, and hold the breath for ten seconds. The design of the inlet opening of some cartridges cannot be effectively covered with the palm of the hand. The test can be performed by covering the inlet opening of the cartridge with a thin latex or nitrile glove. If the face piece remains in its slightly collapsed condition and no inward leakage of air is detected, the tightness of the respirator is considered satisfactory.

The test shall not be conducted if there is any hair growth between the skin and the face piece sealing surface, such as stubble beard growth, beard, moustache or sideburns which cross the respirator sealing surface. Any type of apparel which interferes with a satisfactory fit shall be altered or removed, including glasses.

If a test subject exhibits difficulty in breathing during the tests, she or he shall be referred to a physician or other licensed health care professional, as appropriate, to determine whether the test subject can wear a respirator while performing her or his duties. If the employee finds the fit of the respirator unacceptable, the test subject shall be given the opportunity to select a different respirator and to be retested.

Prior to the commencement of the fit test, the test subject shall be given a description of the fit test and the test subject's responsibilities during the test procedure. The description of the process shall include a description of the test exercises that the subject will be performing. The respirator to be tested shall be worn for at least 5 minutes before the start of the fit test.

The fit test shall be performed while the test subject is wearing any applicable safety equipment that may be worn during actual respirator use which could interfere with respirator fit.

#### Test Exercises

Each test exercise shall be performed for one minute except for the grimace exercise which shall be performed for 15 seconds. The test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried. If due to medical or health conditions the employee cannot perform the test exercises the fit test shall not be performed and the employee not allowed to use a respirator until all elements of the fit test can be achieved.

The respirator shall not be adjusted once the fit test exercises begin. Any adjustment voids the test, and the fit test must be repeated.

The following test exercises are to be performed for all fit testing methods prescribed in this procedure:

- Normal breathing. In a normal standing position, without talking, the subject shall breathe normally.
- Deep breathing. In a normal standing position, the subject shall breathe slowly and deeply, taking caution so as not to hyperventilate.

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- Turning head side to side. Standing in place, the subject shall slowly turn his/her head from side to side between the extreme positions on each side. The head shall be held at each extreme momentarily so the subject can inhale at each side.
- Moving head up and down. Standing in place, the subject shall slowly move his/her head up and down. The subject shall be instructed to inhale in the up position (i.e., when looking toward the ceiling).
- Talking. The subject shall talk out loud slowly and loud enough so as to be heard clearly by the test conductor. The subject shall read from the Rainbow Passage

#### <u>Rainbow Passage</u>

"When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above, and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds it. When a man looks for something beyond reach, his friends say he is looking for the pot of gold at the end of the rainbow." Continue to read for one minute.

- Grimace. The test subject shall grimace by smiling or frowning. (This applies only to QNFT testing; it is not performed for QLFT)
- Jogging in place. The test subject shall jog in place being careful to be aware of their surroundings.
- Normal breathing. Same as exercise (1).

# Qualitative Fit Test (QLFT) Protocols

#### <u>General</u>

Waco, Inc. shall ensure that persons administering QLFT are able to prepare test solutions, calibrate equipment and perform tests properly, recognize invalid tests, and ensure that test equipment is in proper working order. Waco, Inc. shall ensure that QLFT equipment is kept clean and well maintained so as to operate within the parameters for which it was designed.

#### Irritant Smoke (Stannic Chloride) Protocol

This qualitative fit test uses a person's response to the irritating chemicals released in the ``smoke'' produced by a stannic chloride ventilation smoke tube to detect leakage into the respirator.

General Requirements and Precautions. The respirator to be tested shall be equipped with high efficiency particulate air (HEPA) or P100 series filter(s).

Only stannic chloride smoke tubes shall be used for this protocol. No form of test enclosure or hood for the test subject shall be used.

The smoke can be irritating to the eyes, lungs, and nasal passages. The test conductor shall take precautions to minimize the test subject's exposure to irritant smoke. Sensitivity varies, and certain individuals may respond to a greater degree to irritant smoke. Care shall be taken when performing the sensitivity screening checks that determine whether the test subject can detect irritant smoke to use only the minimum amount of smoke necessary to elicit a response from the test subject.

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The fit test shall be performed in an area with adequate ventilation to prevent exposure of the person conducting the fit test or the build-up of irritant smoke in the general atmosphere.

The person to be tested must demonstrate his or her ability to detect a weak concentration of the irritant smoke.

- The test operator shall break both ends of a ventilation smoke tube containing stannic chloride, and attach one end of the smoke tube to a low flow air pump set to deliver 200 milliliters per minute, or an aspirator squeeze bulb. The test operator shall cover the other end of the smoke tube with a short piece of tubing to prevent potential injury from the jagged end of the smoke tube.
- The test operator shall advise the test subject that the smoke can be irritating to the eyes, lungs, and nasal passages and instruct the subject to keep his/her eyes closed while the test is performed.
- The test subject shall be allowed to smell a weak concentration of the irritant smoke before the respirator is donned to become familiar with its irritating properties and to determine if he/she can detect the irritating properties of the smoke. The test operator shall *carefully direct a small amount* of the irritant smoke in the test subject's direction to determine that he/she can detect it.

# Irritant Smoke Fit Test Procedure

- The person being fit tested shall don the respirator without assistance, and perform the required user seal check(s).
- The test subject shall be instructed to keep his/her eyes closed if wearing a half face respirator.
- The test operator shall direct the stream of irritant smoke from the smoke tube toward the face seal area of the test subject, using the low flow pump or the squeeze bulb. The test operator shall begin at least 12 inches from the face piece and move the smoke stream around the whole perimeter of the mask. The operator shall gradually make two more passes around the perimeter of the mask, moving to within six inches of the respirator.
- If the person being tested has not had an involuntary response and/or detected the irritant smoke, proceed with the test exercises.
- The exercises identified in the Test Exercises of this procedure shall be performed by the test subject while the respirator seal is being continually challenged by the smoke, directed around the perimeter of the respirator at a distance of six inches.
- If the person being fit tested reports detecting the irritant smoke at any time, the test is failed. The person being retested must repeat the entire sensitivity check and fit test procedure.
- Each test subject passing the irritant smoke test without evidence of a response (involuntary cough, irritation) shall be given a second sensitivity screening check, with the smoke from the same smoke tube used during the fit test, once the respirator has been removed, to determine whether he/she still reacts to the smoke. Failure to evoke a response shall void the fit test.
- If a response is produced during this second sensitivity check, then the fit test is passed. The glass tube shall be disposed of properly.

# Quantitative Fit Test (QNFT) Protocols

Using controlled negative pressure and appropriate instrumentation to measure the volumetric leak rate of a face piece to quantify the respirator have been demonstrated to be acceptable to OSHA.

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Waco, Inc. shall ensure that persons administering QNFT are able to calibrate equipment and perform tests properly, recognize invalid tests, calculate fit factors properly and ensure that test equipment is in proper working order.

Waco, Inc. shall ensure that QNFT equipment is kept clean, and is maintained and calibrated according to the manufacturer's instructions so as to operate at the parameters for which it was designed.

# Portacount Fit Test Requirements

- Check the respirator to make sure the respirator is fitted with a high-efficiency filter and that the sampling probe and line are properly attached to the face piece.
- Instruct the person to be tested to don the respirator for five minutes before the fit test starts. This purges the ambient particles trapped inside the respirator and permits the wearer to make certain the respirator is comfortable. This individual shall already have been trained on how to wear the respirator properly.
- Check the following conditions for the adequacy of the respirator fit: Chin properly placed; Adequate strap tension, not overly tightened; Fit across nose bridge; Respirator of proper size to span distance from nose to chin; Tendency of the respirator to slip; Self-observation in a mirror to evaluate fit and respirator position.
- Have the person wearing the respirator do a user seal check. If leakage is detected, determine the cause. If leakage is from a poorly fitting face piece, try another size of the same model respirator, or another model of respirator.
- Follow the manufacturer's instructions for operating the Portacount and proceed with the test.
- The test subject shall be instructed to perform the exercises in Test Exercises section of this procedure.
- After the test exercises, the test subject shall be questioned by the test conductor regarding the comfort of the respirator upon completion of the protocol. If it has become unacceptable, another model of respirator shall be tried.

#### Portacount Test Instrument

The Portacount will automatically stop and calculate the overall fit factor for the entire set of exercises. The overall fit factor is what counts. The Pass or Fail message will indicate whether or not the test was successful. If the test was a Pass, the fit test is over. Since the pass or fail criterion of the Portacount is user programmable, the test operator shall ensure that the pass or fail criterion meet the requirements for minimum respirator performance.

A record of the test needs to be sent to the Safety Manager and kept on file, assuming the fit test was successful. The record must contain the test subject's name; overall fit factor; make, model, style, and size of respirator used; and date tested.

#### Use, Maintenance and Care of Respirators

This section requires Waco, Inc. to provide for the use, cleaning and disinfecting, storage, inspection, and repair of respirators used by employees. Appendix B - Respirator Cleaning Procedures (Mandatory) shall be followed.

Use

- Items that can affect the face to mask seal are prohibited. This includes facial hair, glasses, clothing, etc.
- Each time a respirator is put on a positive and negative pressure check shall be performed.

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# **Cleaning and Disinfecting Requirements**

Waco, Inc. shall provide each respirator user with a respirator that is clean, sanitary, and in good working order. Waco, Inc. shall ensure that respirators are cleaned and disinfected using the procedures in this Respiratory Protection Program, or procedures recommended by the respirator manufacturer, provided that such procedures are of equivalent effectiveness. The respirators shall be cleaned and disinfected at the following intervals:

- Respirators issued for the exclusive use of an employee shall be cleaned and disinfected by the employee as often as necessary to be maintained in a sanitary condition,
- Respirators used in fit testing and training shall be cleaned and disinfected after each use by the Safety Manager or designated person.
- Each individual who is assigned a cartridge respirator is responsible for seeing that the respirator is cleaned, inspected and properly stored.

#### **Cleaning Procedures**

- Remove filters, cartridges, or canisters. Disassemble face pieces by removing speaking diaphragms, demand and pressure-demand valve assemblies, hoses, or any components recommended by the manufacturer. Discard or repair any defective parts.
- Wash components in warm water with a mild detergent or with a cleaner recommended by the manufacturer. A stiff bristle (not wire) brush may be used to facilitate the removal of dirt.
- Rinse components thoroughly in clean, warm, preferably running water. Drain.
- When the cleaner used does not contain a disinfecting agent, respirator components should be immersed for two minutes in commercially available cleansers of equivalent disinfectant quality. Another alternative is to use wipes containing alcohol that are intended for use with respirators.
- Rinse components thoroughly in clean, warm, preferably running water. Drain. The importance of thorough rinsing cannot be overemphasized. Detergents or disinfectants that dry on face pieces may result in dermatitis. In addition, some disinfectants may cause deterioration of rubber or corrosion of metal parts if not completely removed.
- Components should be hand-dried with a clean lint-free cloth or air dried. Reassemble face piece, replacing filters, cartridges, and canisters where necessary. Test the respirator to ensure that all components work properly.

#### Storage and Inspection

- Respiratory equipment shall be stored in a manner to protect it from damage, contamination, temperature extreme, etc.
- Respiratory equipment intended for emergency use shall be stored in an area that is readily accessible and be clearly marked.

Waco, Inc. shall ensure that respirators are inspected as follows:

- All respirators used in routine situations shall be inspected by the employee before each use and during cleaning;
- A check by the employee of respirator function, tightness of connections, and the condition of the various parts including, but not limited to, the face piece, head straps, valves, connecting tube, and cartridges, canisters or filters; and
- A check of elastomeric parts for pliability and signs of deterioration.
- Emergency respiratory equipment will be inspected at least monthly, and before and after each use.

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• Escape only respiratory equipment will be inspected before being carried into workplace.

# Breathing Air Quality and Use

Waco, Inc. shall ensure that compressed air accords with the following specifications:

- Compressed breathing air shall meet at least the requirements for Type 1-Grade D breathing air described in ANSI/Compressed Gas Association Commodity Specification for Air, G-7.1-1989, to include:
  - Oxygen content (v/v) of 19.5-23.5%;
  - Hydrocarbon (condensed) content of 5 milligrams per cubic meter of air or less;
  - Carbon monoxide (CO) content of 10 ppm or less;
  - Carbon dioxide content of 1,000 ppm or less; and
  - Lack of noticeable odor.
- Waco, Inc. shall ensure that oxygen is not used in compressed air units.
- Waco, Inc. shall ensure that oxygen concentrations greater than 23.5% are used only in equipment designed for oxygen service or distribution.
- Waco, Inc. shall ensure that cylinders used to supply breathing air to respirators meet DOT requirements and that:
  - Cylinders are tested and maintained as prescribed in the Shipping Container Specification Regulations of the Department of Transportation (49 CFR part 173 and part 178);
  - Cylinders of purchased breathing air have a certificate of analysis from the supplier that the breathing air meets the requirements for Type 1--Grade D breathing air; and
  - The moisture content in the cylinder does not exceed a dew point of -50 deg. F (-45.6 deg. C) at 1 atmosphere pressure.
- Waco, Inc. shall ensure that compressors used to supply breathing air to respirators are constructed and situated so as to:
  - Prevent entry of contaminated air into the air-supply system;
  - Minimize moisture content so that the dew point at 1 atmosphere pressure is 10 degrees F (5.56 deg.
     C) below the ambient temperature;
  - Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions.
- Have a tag containing the most recent change date and the signature of the person authorized by Waco, Inc. to perform the change. The tag shall be maintained at the compressor.
- For compressors that are not oil-lubricated, Waco, Inc. shall ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.
- For oil-lubricated compressors, Waco, Inc. shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.
- Waco, Inc. shall ensure that breathing air couplings are incompatible with outlets for nonrespirable worksite air or other gas systems. No asphyxiating substance shall be introduced into breathing air lines.

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## Repairs

Waco, Inc. shall ensure that respirators that fail an inspection or are otherwise found to be defective are immediately removed from service, and are discarded or repaired or adjusted in accordance with the following procedures:

- Repairs or adjustments to respirators are to be made only by persons appropriately trained to perform such operations and shall use only the respirator manufacturer's NIOSH-approved parts designed for the respirator;
- Repairs shall be made according to the manufacturer's recommendations and specifications for the type and extent of repairs to be performed; and

#### Voluntary Use

If an employee chooses to voluntarily wear a respirator when not required by this Program (contaminants do not meet protection standards, odors, etc.) they will be advised of the following in their training:

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for employees.

However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the employee. Sometimes, employees may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, of if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

You should do the following:

- Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
- Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
- Keep track of your respirator so that you do not mistakenly use someone else's respirator.

# Workplace Monitoring

A program of monitoring potential employee exposures has been implemented through the corporate health and safety department. Project personnel may also be assigned with the task of conducting air monitoring. Direct-reading instruments will also be used in the characterization of potential exposures. All the data collected is used to determine the appropriateness of the respiratory equipment.

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# Recordkeeping

Waco, Inc. will establish and retain written information regarding medical evaluations, fit testing and the respirator program. Records of medical evaluations required by this section must be retained and made available in accordance with 29 CFR 1910.1020. Waco, Inc. shall provide the employee with an opportunity to discuss the questionnaire and examination results with the PLHCP.

Records will be treated confidentially and maintained on file in the Waco, Inc. corporate office by the Safety Manager.

# **Program Evaluation**

Waco, Inc. shall conduct evaluations of the workplace as necessary to ensure that the provisions of the current written program are being effectively implemented and that it continues to be effective.

Waco, Inc. shall regularly consult employees required to use respirators to assess the employees' views on this program's effectiveness and to identify any problems. Any problems that are identified during this assessment shall be corrected. Factors to be assessed and verified include, but are not limited to:

- Respirator fit (including the ability to use the respirator without interfering with effective workplace performance); Appropriate respirator selection for the hazards to which the employee is exposed;
- Proper respirator use under the workplace conditions the employee encounters; and
- Proper respirator maintenance.

# Training

All employees will receive respirator training during their initial health and safety training class and on at least an annual basis, if required for their job classification. Training shall address employee knowledge of respirators, fit, use, limitations, emergency situations, wearing, fit checks, maintenance & storage, medical signs and symptoms of effective use and general requirements of the OSHA standard. The training must be provided before requiring the employee to use the respirator.

#### Retraining

Retraining shall be administered annually, and when the following situations occur:

- Changes in the workplace or the type of respirator render previous training obsolete;
- Inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill; or
- Any other situation arises in which retraining appears necessary to ensure safe respirator use.

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Note: Employe	Waco, Inc. Qualitative ee Must Have Completed Respiratory	Respiratory Fit Test Record Protection Training and Passed A		esting
Test Date:				
Employee Na	ime:	SS#		
Test Agent:	Irritant Smoke (Stannic Ch	nloride)		
	<u>Respira</u>	tor Identification:		
Model: <u>North 7700 Se</u> Manufacturer: <u>Nort</u> Additional Information	th Safety Products	Size (circle one): Small Approval No: <u>42 CFR 84</u> <u>be equipped with North HE</u>	-	
	Fit Test Protocol (Test Subject	Initials indicate steps wer	e performed):	
	TOLD TO KEEP EYE	S CLOSED DURING SMOKE EXPOS	URE	
Protocol reviewed Shown how to wea Mirror available fo	ar respirator	Test subject o Performed po	or 5 minutes before lid not have hair in fit sitive pressure & neg sfully after seating res	ting area gative fit
	<u>Fit Test Steps (1 min</u>	ute each except Grimace =	<u>15 seconds)</u>	
Breath normally Nod up and down Jog in place	Breathe dee Talking (Rea Breath norr	ad Rainbow Passage)	Turned head si Grimace	de to side
light into many beautif apparently beyond the l	kes raindrops in the air, they act ul colors. These take the shape horizon. There is, according to le oks for something beyond his re	e of a long round arch, with gend, a boiling pot of gold at	its path high above, a one end. People look,	nd its two ends but no one ever
Test Subject Signature	Fit Test Results:	Pass Date:	_ Fail	
Examiner's Name:	Examine	er's Signature:	Date:	
Distribution: Emp	loyee Local File - Waco, Inc. Safet	y & Training Dept		

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RIGGING MATERIAL HANDLING			Next Revision Date:	02/01/2025
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# Purpose

The purpose of this training program is to ensure a safe and incident free lifting operation.

#### Scope

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

#### **Key Responsibilities**

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

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

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

#### Procedure

#### General

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

#### Material Handling

- Rigging equipment shall be inspected to ensure it is safe. Rigging equipment for material handling shall be inspected prior to use and on each shift and as necessary during its use to ensure that equipment is safe.
- Defective rigging shall be removed from service. Defective equipment shall not be used and removed from service immediately.
- Rigging equipment shall not be loaded in excess of its recommended safe working load. Rigging equipment shall not be loaded beyond its recommended safe working load and load identification shall be attached to the rigging.
- Rigging equipment, when not in use, shall be removed from the immediate work area. Rigging equipment not in use shall be removed from the immediate work area so as not to present a hazard to employees.
- Tag lines shall be used unless their use creates an unsafe condition.
- Latches will be in place on all hooks, eliminating the hook throat opening. Hooks on overhaul ball
  assemblies, lower load blocks, or other attachment assemblies shall be a type that can be closed and
  locked, eliminating the hook throat opening. Alternatively, an alloy anchor type shackle with a bolt, nut
  and retaining pin may be used.
- All employees shall be kept clear of loads about to be lifted and of suspended loads. No employee shall be allowed under a suspended load.

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# **Training and Education**

WACO, INC. employees shall display their competency in the following topics:

- The selection of proper hardware (eye bolts, shackles, hooks, wire rope products, synthetic slings, chain slings, etc.) for the correct application (weight, hitches, angles, temperatures, center of gravity, etc.).
- The inspection of the selected hardware before, during and after the lift.
- The proper methods of securing the load, attaching the load to the hook, lifting the load, handling of the load during the movement of the load and lowering and placement of load.
- The proper storage of the rigging equipment.
- All WACO, INC. employees shall re-certify their training on a four (4) year basis.

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# Purpose

The purpose of this program is to prevent injuries due to falls from elevated work areas and ensure employees and contractors are able to inspect scaffolding materials and erected scaffolds.

#### Scope

This program is applicable at every work area where scaffolding is erected. When work is performed on a nonowned or operated site, the operator's program shall take precedence, however, this document covers WACO, INC. employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

#### Definitions

Bearer - A horizontal member of a scaffold upon which the platform rests and which may be supported by ledgers.

Brace - A tie that holds one scaffold member in a fixed position with respect to another member.

Coupler - A device for locking together the components of a tubular metal scaffold which shall be designed and used to safely support the maximum intended loads.

Double pole or independent pole scaffold - A scaffold supported from the base by a double row of uprights, independent of support from the walls and constructed of uprights, ledgers, horizontal platform bearers, and diagonal bracing.

Guardrail - A rail secured to uprights and erected along the exposed sides and ends of platforms.

Heavy Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 75 pounds per square foot.

Ledger (stringer) - A horizontal scaffold member which extends from post to post and which supports the putlogs or bearer forming a tie between the posts.

Light Duty Scaffold - A scaffold designed and constructed to carry a working load not to exceed 25 pounds per square foot.

Manually Propelled Mobile Scaffold - Manually propelled mobile scaffold.

Maximum intended load - The total of all loads including the working load, the weight of the scaffold, and such other loads as may be reasonably anticipated.

Medium duty scaffold - A scaffold designed and constructed to carry a working load not to exceed 50 pounds per square foot.

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Mid-Rail - A rail approximately midway between the guardrail and platform, used when required, and secured to the uprights erected along the exposed sides and ends of platforms.

Putlog - A scaffold member upon which the platform rests.

Runner - The lengthwise horizontal bracing or bearing members or both.

Scaffold - Any temporary elevated platform and its supporting structure used for supporting workmen or materials or both.

Toe board - A barrier secured along the sides and ends of a platform, to guard against the falling of material.

Tube and coupler scaffold - An assembly consisting of tubing, which serves as posts, bearers, braces, ties, and runners, a base supporting the posts, and special couplers which serve to connect the uprights and to join the various members.

Tubular welded frame scaffold - A sectional, panel, or frame metal scaffold substantially built up of prefabricated welded sections that consist of posts and horizontal bearer with intermediate members. Panels or frames shall be braced with diagonal or cross braces.

Working Load - Load imposed by men, materials, and equipment.

# **Key Responsibilities**

#### Managers and Supervisors

- Responsible for ensuring that scaffolds are erected by a qualified person, that set up inspections are performed, and all daily inspections are performed before work starts for the day.
- Responsible for ensuring that all employees, and/or contractors have been trained in the use and
  inspection methods for scaffolds. Only qualified and competent personnel are allowed to use or modify
  scaffolding systems.
- Responsible for ensuring that all employees and contractors are aware that if an inspection discovers a defect, the scaffold cannot be used until repairs are made.

#### Employees

• Responsible for following this program by inspecting the scaffolds daily and report any damages or repairs that may be needed to their supervisor.

# Procedure

#### **General Requirements**

Scaffolds shall be furnished and erected in accordance with applicable standards for persons engaged in work that cannot be done safely from the ground or from solid construction. Except that ladders used for such work shall conform to ladder safety standards.

Scaffolds shall only be erected by a qualified third party, who is competent to certify the scaffolding safe to use.

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The footing or anchorage for scaffolds shall be sound, rigid, and capable of carrying the maximum intended load without settling or displacement. Unstable objects such as barrels, boxes, loose boards shall not be used to support scaffolds or planks.

Scaffolds and their components shall be capable of supporting without failure at least four times the maximum intended loads. Scaffold components must meet OSHA requirements 29 CFR 1910.28 and 29 CFR 1926.451.

Wood scaffold planks must be cross-supported every 8 feet. Scaffold deck boards shall be cleated, wired or nailed into place.

All working levels of scaffolds will be floored completely except where internal ladders require space for ladder openings.

Scaffolds and other devices mentioned or described in this program shall be maintained in safe condition. Scaffolds shall not be altered or moved horizontally while they are occupied.

Any scaffold damaged or weakened from any cause shall be immediately repaired and shall not be used until repairs have been completed.

Scaffolds shall not be loaded in excess of the working loads for which they are intended.

Bolts used in the construction of scaffolds shall be of adequate size and in sufficient numbers at each connection to develop the designed strength of the scaffold.

All platforms shall be overlapped (minimum 12 inches) and secured from any movement.

An access ladder or equivalent safe access shall be provided.

Scaffold planks shall extend over their end supports not less than 6 inches or more than 18 inches.

The poles, legs, or uprights of scaffolds shall be plumb, and securely and rigidly braced to prevent swaying and displacement.

Materials being hoisted onto a scaffold shall have a tag line.

Overhead protection shall be provided for workers on a scaffold exposed to overhead hazards.

Toe boards and guardrails shall be installed if a scaffold or platform is erected to a height of 6 feet or more. Scaffolds shall be provided with a screen between the toe board and the guardrail, extending along the entire opening, consisting of No. 18 gauge wire one-half inch mesh or the equivalent, where workers are required to work or pass under the scaffolds.

Work shall not be performed on a scaffold during storms or high winds.

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Work shall not be performed on scaffolds that are covered with snow or ice, unless all snow and ice has been removed and all planking has been sanded to prevent slipping.

Tools, material, and debris shall not be allowed to accumulate in quantities to cause a hazard.

#### Inspections

Scaffolding shall be inspected, by a qualified person, in conjunction with the manufactures required recommendations. The competent person must also insure scaffolds are safe prior to and during scaffold use.

- At a minimum, the following shall be inspected by the competent person after erection, before the start of the day or beginning of a shift change to ensure scaffolds are safe prior to and during use:
  - Ground or surface footing shall be inspected to ensure that there is no settling.
  - All main supports and cross braces shall be inspected for any signs of damage, missing pins, bolts and any locks and/or safety keepers.
  - All walking surfaces and/or planks shall be inspected for damage and proper placements and any possible movement.
  - All walkways and planks must be secure to prevent any movement.
- Inspection shall be made to ensure that the scaffold is stable and any movement is prevented.
- If during the inspection, a defect or damage to the scaffold is discovered, the scaffold shall be tagged out by the competent person, complied with and use prohibited until needed repairs are made.

#### Mandatory Signs and Tags for Defects Found

Signs and tags shall be visible at all times when work is being performed, and shall be removed or covered promptly when the hazards no longer exist. Employees shall be instructed in complying with signs and tags.

Defective or unsafe equipment or conditions shall be tagged out by the competent person using a weather resistant tag secured to the scaffolding structure on all four sides and must be complied with. An example would be improper footing conditions were observed.

Danger signs shall be used only where an immediate hazard exists. Danger signs must be posted around the immediate area of the scaffold, to alert other workers of possible danger from falling objects from the scaffold.

Caution Signs and/or barricade tape shall be used to mark off a larger area around scaffolding warning other workers to use caution.

#### Modifications

Modification and repairs shall be performed by a qualified person, who is competent to certify the scaffolding safe to use to ensure non-qualified personnel do not create additional hazards.

Employees shall not perform any modifications or repairs, unless they have been trained and certified, and failure to comply may result in disciplinary action and or termination.

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# **Training Requirements**

WACO, INC. is required to train all employees that work on scaffolds regarding hazards by "qualified" persons. The supervisor shall have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards. The training shall occur before use and include the following areas:

- Basic safety information and duties of a competent person assembling/disassembling scaffolding (see below). Basic safety information must be provided prior to use and when conditions change.
- Hazards including fall protection, electrical safety, falling object protection (see below).
- Tags types and the requirement to comply with.
- The proper use of the scaffold, and the proper handling of materials on the scaffold.
- The correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used.
- The maximum intended load capacity of the scaffolds used.

The supervisor shall have each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold trained by a competent person to recognize any hazards associated with the work in question.

- The training shall include the following topics, as applicable:
- The nature of scaffold hazards.
- The correct procedures for erecting, disassembling, moving, operating, repairing, inspecting, and maintaining the type of scaffold in use.
- The design criteria, maximum intended load-carrying capacity and intended use of the scaffold.

When the employer has reason to believe that an employee lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, the employer shall retrain each employee so that the requisite proficiency is regained. Retraining is also required in at least the following situations:

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

# Hazards Associated with the Use of Scaffolds

- Nearby electrical lines or source of electrical hazards
- Poor foundation scaffold shall be erected on a firm and stable base.
- Damaged scaffold components.
- Overload of scaffold components (load capacity).
- Unstable, incomplete or incorrect use of scaffold.
- Base frames not adequately braced, tied or supported.

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- Scaffold exceeds height to base dimensions ratio.
- Inappropriate access or egress points.
- Slips and falls.
- Falling objects.
- Manual handling.
- Movement of plant and machinery all cranes and mobile machinery shall keep within designated areas and away from scaffolding.

#### **Duties of a Competent Person Assembling/Disassembling Scaffolding**

#### <u>General</u>

- To select and direct employees who erect, dismantle, move, or alter scaffolds.
- To determine if it is safe for employees to work on or from a scaffold during storms or high winds and to ensure that a personal fall arrest system or wind screens protect these employees. (Note: Windscreens should not be used unless the scaffold is secured against the anticipated wind forces imposed.)

#### For Training

• To train employees involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting scaffolds to recognize associated work hazards.

#### For Inspections

- To inspect scaffolds and scaffold components for visible defects before each work shift and after any occurrence which could affect the corrective actions.
- To inspect ropes on suspended scaffolds prior to each work shift and after every occurrence which could affect the structural integrity and to authorize prompt corrective actions.
- To inspect manila or plastic (or other synthetic) rope being used for top rails or midrails.

#### For Suspension Scaffolds

- To evaluate direct connections to support the load.
- To evaluate the need to secure two-point and multi-point scaffolds to prevent swaying.

#### For Erectors and Dismantlers

- To determine the feasibility and safety of providing fall protection and access.
- To train erectors and dismantlers to recognize associated work hazards.

#### For Scaffold Components

- To determine if a scaffold will be structurally sound when intermixing components from different manufacturers.
- To determine if galvanic action has affected the capacity when using components of dissimilar metals.

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# Tube And Coupler Scaffolds - Light Duty

Uniformly distributed load		Not to exceed 25 p.s.f.	
Post Spacing (longitudinal)		10 ft. 0 in.	
Post Spacing (transver	Post Spacing (transverse)		6 ft. 0 in.
Working Levels	Additional Planked Levels		Maximum Height
1	8		125 ft.
2	4		125 ft.
3	(	0	91 ft. 0 in.

# Tube And Coupler Scaffolds - Medium Duty

Uniformly distributed load		Not to exceed 50 p.s.f	
Post spacing (longitudi	inal)	8 ft. 0 in.	
Post spacing (transver	rse)	6 ft. 0 in.	
Working Levels	Additional Planked Levels		Maximum Height
1	6		125 ft.
2	(	)	78 ft. 0 in.

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# Purpose

The purpose of the silica exposure control plan (ECP) is to set out our approach to protecting workers from harmful exposure to respirable crystalline silica.

A combination of control measures will be required to achieve this objective. We commit to being diligent in our efforts to select the most effective control technologies available, and to ensure that the best practices, as described in this Exposure Control Plan (ECP), are followed at our worksites.

The work procedures we establish will protect not only our workers but all workers on our worksites.

# **Key Responsibilities**

Due to the significant risk posed by respirable crystalline silica, it is critical that all personnel involved in operations that could potentially create silica dust take specific action to ensure that, as much as possible, a hazard is not created.

#### WACO, INC. is responsible for:

- Substitution of less hazardous products for those that contain crystalline silica is required.
- Ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this exposure control plan (ECP) are readily available where and when they are required.
- Providing a job-specific ECP for each project, which outlines in detail the work methods and practices that will be followed on each site. Considerations will include
  - Availability and delivery of all required tools/equipment
  - Scope and nature of grinding work to be conducted
  - o Control methods to be used and level of respiratory protection required
  - o Coordination plan
- Conducting a periodic review of the effectiveness of the ECP. This would include a review of the available dust-control technologies to ensure these are selected and used when practical.
- Initiating sampling of worker exposure to concrete dust when there are non-standard work practices for which the control methods to be used have not been proven to be adequately protective.
- Ensuring that all required tools, equipment, and personal protective equipment are readily available and used as required by the ECP.
- Ensuring supervisors and workers are educated and trained to an acceptable level of competency.
- Maintaining records of training, fit-test results, crew talks, and inspections (equipment, PPE, work methods/practices).
- Coordinating the work with the prime contractor and other employers to ensure a safe work environment.
- Ensuring that a copy of the written exposure control plan is available to all employees. The written exposure control plan must be available for examination and copying by each employee. Copies may be available electronically or physically, depending on location needs and requirements.

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# The supervisor (foreman and lead hand) is responsible for:

- Obtaining a copy of the ECP from WACO, INC. and making it available at the worksite
- Selecting, implementing, and documenting the appropriate site-specific control measures
- Providing adequate instruction to workers on the hazards of working with silica-containing materials (e.g., concrete) and on the precautions specified in the job-specific plan covering hazards at the location
- Ensuring that workers are using the proper respirators and have been fit-tested, and that the results are recorded
- Directing the work in a manner that ensures the risk to workers is minimized and adequately controlled
- Communicating with the prime contractor and other sub-contractors to ensure a safe work environment

# The worker is responsible for:

- Knowing the hazards of silica dust exposure
- Using the assigned protective equipment in an effective and safe manner
- Setting up the operation in accordance with the site-specific plan
- Following established work procedures as directed by the supervisor
- Reporting any unsafe conditions or acts to the supervisor
- Knowing how and when to report exposure incidents

# **Crystalline Silica Properties**

Crystalline silica is a common mineral found in many naturally occurring materials and used in many industrial products and at construction sites. Materials like sand, concrete, stone and mortar contain crystalline silica. Crystalline silica is also used to make products such as glass, pottery, ceramics, bricks, concrete and artificial stone. Industrial sand used in certain operations, such as foundry work and hydraulic fracturing (fracking), is also a source of crystalline silica exposure. Amorphous silica, such as silica gel, is not crystalline silica.

Inhaling very small ("respirable") crystalline silica particles, causes multiple diseases, including silicosis, an incurable lung disease that can lead to disability and death. Respirable crystalline silica also causes lung cancer, chronic obstructive pulmonary disease (COPD), and kidney disease.

# List of Tasks That Expose Employees to Respirable Crystalline Silica

A list or description of tasks in the workplace that expose employees to respirable crystalline silica must be in place. Tasks include activities like the below and anything else that is likely to expose employees to respirable crystalline silica:

- Sawing
- Drilling
- Grinding
- Abrasive blasting (e.g., of concrete structures)
- Jackhammering, chipping, or drilling rock or concrete
- Cutting brick or tiles
- Sawing or grinding concrete
- Tuck point grinding

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- Road construction
- Loading, hauling, and dumping gravel
- Demolition of structures containing concrete
- Sweeping concrete dust

The list of tasks shall be included in the job hazard assessment or any other form of prework hazard assessment.

#### Health Hazards

Exposure to respirable crystalline silica has been shown to cause silicosis, lung cancer, pulmonary tuberculosis, and other airway diseases. Crystalline silica dust can cause a disabling, sometimes fatal disease called silicosis. The fine particles are deposited in the lungs, causing thickening, and scarring of the lung tissue. The scar tissue restricts the lungs' ability to extract oxygen from the air. This damage is permanent, but symptoms of the disease may not appear for many years.

A worker may develop any of three types of silicosis, depending on the concentrations of silica dust and the duration of exposure:

- Chronic silicosis—develops after 10 or more years of exposure to crystalline silica at relatively low concentrations
- Accelerated silicosis—develops 5 to 10 years after initial exposure to crystalline silica at high concentrations
- Acute silicosis—develops within a few weeks, or 4 to 5 years, after exposure to very high concentrations of crystalline silica

Initially, workers with silicosis may have no symptoms; however, as the disease progresses, a worker may experience:

- Shortness of breath
- Severe cough
- Weakness

These symptoms can worsen over time and lead to death. Exposure to silica has also been linked to other diseases, including bronchitis, tuberculosis, and lung cancer.

#### **Exposure Assessments**

Exposure assessments must be conducted for those employees who are expected to be exposed to respirable crystalline silica at or above the action level. The exposure of each employee who is or is expected to be exposed to respirable crystalline silica at or above the action level (8-hour TWA of  $25\mu g/m^3$ ) must be assessed. This assessment can be performed by monitoring employees individually or taking a representative sample from employees.

key step in developing a silica exposure control plan is to identify the work activities that would put workers at risk of exposure.

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- Work activities that may generate airborne silica dust—for silica, the route of exposure is through the inhalation of airborne dust. The employer should have a qualified person review the planned work activities to identify those that may generate airborne silica.
- Identify workers at risk of exposure—For example, workers who finish concrete would be at greater risk of exposure than plumbers or electrical workers.
- Amount of exposure—some work activities generate more dust than others, and the amount of exposure should be estimated. Published resources are available that provide air sampling data and compare silica dust levels from various construction activities.
- Duration of exposure—Workers who grind concrete for a full shift would be at greater risk than workers jackhammering for an hour.

# **Engineering and Work Practice Controls**

Engineering and work practice controls shall be used to reduce and maintain employee exposure to respirable crystalline silica to the lowest feasible level and maintain it at that level when required.

The following hierarchy of control measures must be followed:

- Elimination/substitution (e.g., using products with less silica or using work methods that would eliminate the need for surface grinding)
- Engineering controls (e.g., water, local exhaust ventilation, enclosure)
- Administrative controls (e.g., coordination of tasks with subcontractors, signage)
- The use of proper PPE such as gloves, coveralls and eye protection when exposed to silica. Personal protective equipment such as gloves, coveralls and eye protection will be used to control silica exposures.

Our firm commits to developing knowledge and expertise about these controls, and to establishing policies/procedures to protect workers from harmful exposure and to minimize reliance on respirators. Effective engineering controls such as HEPA vacuum attachments and wetting methods, which control silica dust at its source, are readily available. These controls have been proven to reduce airborne dust levels significantly when selected and operated in accordance with best practices. We know that engineering controls alone do not reduce airborne silica to safe levels; so, in most cases other control measures, including respiratory protection, will be necessary.

If we take on a job that could release an unusually high amount of dust, and we are unsure of the adequacy of our control measures, we will conduct air sampling to ensure that control methods are protective.

We will reduce or eliminate worker exposure to silica dust by selecting a combination of the following controls listed in order of preference:

- Elimination and substitution Engineering
- Administrative Personal protective equipment

# **Elimination and Substitution**

We recognize the importance of planning the work to minimize the amount of silica dust generated. During the project planning phase, we will advocate for the use of methods that reduce the need for cutting, grinding, or drilling of concrete surfaces (e.g., formwork planning). Whenever possible, we will schedule work when concrete is still wet, because we know that much less dust is released at that time.

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# Engineering Control of Dust

Selecting an appropriate control measure depends on the specifics of the operation. In some cases, local exhaust ventilation (LEV) is more effective at controlling exposure (e.g., during grinding operations) than wetting methods. In a different application, wetting may be more effective (e.g., during cutting operations) than LEV. However, using LEV may reduce the amount of final cleaning required, as the silica dust is captured.

Our dust control systems may employ three well-established techniques:

- Local exhaust ventilation (LEV)
- Wet dust suppression (WDS)
- Restricting or isolating the work activity with barriers or full enclosures (this may be the only option where LEV or WDS is not practical or effective)

# Local Exhaust Ventilation (LEV)

When LEV is used in our work, we will employ the following systems and safe work practices:

- Vacuum attachment systems to capture and control the dust at its source whenever possible.
- Dust control systems (used regularly and well maintained).
- Grinding wheels operated at the manufacturers' recommended rpm (operating more than this can generate significantly higher airborne dust levels).
- Retrofit shrouds or exhaust cowlings for corner grinding; use manufacturer-specified rpm speeds and a well-maintained HEPA vacuum.
- Diamond stone grinders, which allow for the use of a more efficient suction casing on the grinder, whenever practicable.
- HEPA or good quality, multi-stage vacuum units approved for use with silica dust. [The vacuum units should can create a target airflow of at least 70 cfm. This should achieve a face velocity at the shroud of about 1.3 m/s (260 fpm)—the higher the face velocity, the more dust captured at source.]
- Work planning, so that concrete grinding can be completed when wet (dust release can be significantly reduced).
- Train workers and supervisors on how to properly use and maintain the equipment.

# Wet methods for Dust Control

When water spray systems are used in our work, we will follow these safe work practices:

- Pneumatic grinders will be used instead of electric-powered grinders if water is the method of control.
- Pressure and flow rate of water will be controlled in accordance with tool manufacturers' specifications (for cutting saws, a minimum of 0.5 liters of water per minute should be used).
- When sawing concrete or masonry, we will use only saws that provide water to the blade.
- Wet slurry will be cleaned from work surfaces when the work is completed, using a wet vacuum or wet sweeping.

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<u>Barriers and Enclosures</u> - When barriers or enclosures are used in our work the site foreman will determine the type and design of barrier or enclosure (based on the work activity and the work area) and ensure it is constructed in accordance with the work plan. Barriers may be simple hazard-flagging ribbon or more restrictive barriers.

# Administrative Controls

We will follow these safe work practices:

- Exposure control plans and the site risk assessment/work plan will be submitted to the general contractor prior to the start of work.
- <u>Housekeeping Measures Put in Place to Limit Employee Exposure to Respirable Crystalline Silica</u> A description of housekeeping measures used to limit exposure to respirable crystalline silica must be in place (and included in the prework hazard assessment). This can include vacuuming, sweeping, wetting and other techniques used to limit the amount of respirable crystalline silica exposure during housekeeping activities. Vacuums with high-efficiency particulate air (HEPA) filters are required.
- We will establish procedures for housekeeping, restricting work areas, personal hygiene, worker training, and supervision.
- As part of our project planning, we will assess when silica dust may be generated and plan to eliminate or control the dust at the source. We recognize that awareness and planning are key factors in the prevention of silicosis.
- Warning signs will be posted to warn workers about the hazards of silica and to specify any protective equipment required (for example, respirators).
- Work schedules will be posted at the boundaries of work areas contaminated with silica dust.
- Work that generates silica dust will be conducted after hours, when access to other unprotected workers cannot be restricted.
- We will develop a site-specific exposure control plan to cover project-specific issues (e.g., scope of work, project location and site-specific hazards) and to be kept available at the worksite.

# **Personal Protective Equipment**

# **Respiratory Protection**

- When required, respirators must be provided to employees that are exposed to respirable crystalline silica.
- Respirators must be provided to employees who are or will be exposed to actionable levels of respirable crystalline silica. If an employee is performing a task listed in Table 1 of 1926.1153 (c) that does not require the use of a respirator then they are not required. All other tasks not covered by Table 1 must be accounted for by providing respirators if necessary.
- Link for Table 1 <a href="https://www.osha.gov/pls/oshaweb/owadisp.show\_document?p">https://www.osha.gov/pls/oshaweb/owadisp.show\_document?p</a> table=STANDARDS&p</a> id=1270#1926.1153(c)
- All workers who wear respirators will do so in adherence with our respiratory protection program.
- Respirators must be selected based upon measured exposure levels and the assigned protection factor of respirators.
- Only approved respirators will be used.
- Workers who wear respirators will be clean-shaven. Filtering face piece respirators give little or no protection to workers with beards, and even a minor growth of stubble can severely reduce the effectiveness of respiratory protection.

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- All workers who wear respirators will be fit-tested.
- Workers will be properly trained in the use of respirators, and a high standard of supervision, inspection, and maintenance will be followed.

#### Protective clothing

WACO, INC. will provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from silica contamination, ensure that silica does not contaminate workers' street clothing, and ensure that a worker does not leave a restricted area until the worker has been decontaminated.

#### Documentation

Records must be kept of the following:

- All workers who are exposed to respirable silica dust while on the job
- Worker education and training sessions
- Respirator fit-testing
- Equipment maintenance and repair
- Worksite inspections
- Medical surveillance when required

#### **Annual Assessment**

The written program's effectiveness must be reviewed at least annually. The written exposure control plan must be evaluated at least once per year and as necessary. Situations where reevaluation may be necessary include regulatory updates, changes in equipment and exposure incidents.

#### **Medical Surveillance**

A medical surveillance program for all employees whose exposure is equal to or exceeds the action level for 30 or more days per year is required. A medical surveillance program must be established for employees who are exposed to the action level of 8-hour TWA of  $25\mu g/m^3$  of respirable crystalline silica. A baseline medical assessment must be available to exposed employees within 30 days of initial assignment unless they have previously received a suitable medical examination in the past three years. This applies to employees who would be required to wear a respirator more than 30 days per year or who are exposed to action level respirable crystalline silica for more than 30 days per year. A suitable prescreen that meets the same requirements is also acceptable.

#### The basics of the medical examination include:

WACO, INC. must bear the cost. The employee needs to go to a qualified health care professional, have an exam, and obtain a written medical opinion which is shared with WACO, INC.. This written opinion needs to contain:

- The date of the exam
- A statement that the exam has specifically checked for silica exposure per the requirements of the standard.
- Any recommended limitations on the employee's exposure to respirable crystalline silica as a result of the exam's findings

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The employee may learn other medical information from his or her physician during the visit, but this is private and not required to be shared with WACO, INC..

The exam conducted by the qualified healthcare provider must include the following:

- A review of the patient's medical and work history.
- A physical examination with special emphasis on the respiratory system.
- A chest x-ray.
- A pulmonary function test administered by a certified spirometry.
- Testing for latent tuberculosis.
- Any other tests deemed appropriate by the healthcare provider.

Information required to be given to the heathcare provider:

- A copy of the OSHA respirable crystalline silica rule.
- Construction Standard <u>https://www.osha.gov/silica/SilicaConstructionRegText.pdf</u>
- Construction Medical https://www.osha.gov/silica/AppendixBtosect1926.1153.pdf
- General Industry/Maritime Standard <a href="https://www.osha.gov/silica/SilicaGeneralIndustryRegText.pdf">https://www.osha.gov/silica/SilicaGeneralIndustryRegText.pdf</a>
- General Industry/Maritime Medical <u>https://www.osha.gov/silica/AppendixBtosect1910.1053.pdf</u>
- A description of the employee's former, current, and anticipated duties as they relate to the employee's occupational exposure to respirable crystalline silica.
- The employee's former, current, and anticipated levels of occupational exposure to respirable crystalline silica.
- A description of any personal protective equipment used or to be used by the employee, including when and for how long the employee has used or will use that equipment.
- Information from records of employment-related medical examinations previously provided to the employee and currently within the control of WACO, INC..

# Records

Applicable records must be kept. Accurate records of all air monitoring data, objective data, and medical surveillance shall be maintained as required by the regulation.

# Training

Employees must be provided with training.

A training program shall be provided for all employees who are exposed to action level respirable crystalline silica. The training shall ensure that employees covered by the written exposure control plan can demonstrate knowledge and understanding of the health hazards associated with respirable crystalline silica, the specific tasks in the workplace that could result in exposure to respirable crystalline silica, the specific measures taken to protect employees from exposure to crystalline silica, the contents of the respirable crystalline silica rule, and the purpose of the medical surveillance program.

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# **CONTROL PLAN**

Date control plan completed:						
Prime contractor:		Superintendent:				
Project manager:		CSO/First aid attendant:				
Project:		Address:				
Waco, Inc. completing work:						
Address:			Conta	act:		
Contact phone:			Contact fax:			
On-site supervisor(s):						
Worker(s):						
Scope of work to be completed:	·					
Work start date:			Duration:	🗆 Days 🗖 Month	s 🛛 Years	
Employer responsible for:						
Supervisor responsible for:						
Worker responsible for:						
HAZARDS IDENTIFIED (other tha	n silica	CONTROL MEAS	SURE(S)			
□ Falls						
□ Slipping						
Confined space						
Workers above						
Workers below						
□ Noise						
Electrical						
Overview of work procedure (Hov	v are you	going to work saf	ely?):			
Workers trained in (training record	s must be	available for revi	iew):			
Proper use of grinding equipment		Y ND	Proper use of admir	n controls	Y□ N□	
Proper use of engineering controls		Y N	Proper use of PPE	Y□ N□		
Proper disposal methods		Y N	□ Other (fall protection, swing stages, etc.) Y□ N			
Respirators (Refer to ECP for respira	ator requi	rements)				
Required: Y N	Ava	ilable: Y□ N□		Fit-tested: Y□ N□		

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	E required for a	copo of work (other than	rocairatarl						
-		cope of work (other than ves $\Box$ Rubber boots $\Box$ Ey		Pofloctivo	wast 🗖 Haari	ng protoct	ion		
				Reflective		ng protect	1011		
		attached to control plan ol program 🗖 Respirator		ogram 🗖	Training roc	orde 🗆 SV	MD (tools and	l aquipmont)	
			y protection pr					a equipment)	
Pro	Project management signature Position: Date:								
Со	ntractor superv	visor signature		Position	ו:		Date:		
Та	sk/risk manage	ment matrix (relating to si	lica dust) use tab	le 1 for co	des, separate v	with a com	ma (.)		
#	Date/Duration	Task	Controls				Supplies/		
#	Date/Duration	IdSK	Engineering		Administrative		PPE	Equipment	
			_					_	
<u> </u>									
			_						
			_						
		<pre>k management matrix above</pre>							
SIT	E INSPECTION	CHECKLIST (complete pre-	work & periodica	ally during	project)				
En	gineering contr	ols	Problem no	ted (DETA	IL)	Problem	m corrected	(DETAIL)	
Ava	ailable at site	Y N	]						
			- I						
Ор	erating correctly	Y N N	]						
	erating correctly ed appropriately								
Use		Y N	]						
Use Effe	ed appropriately	Y N	]						
Use Effe Ad	ed appropriately ective in dust cor	Y N	] ]						
Use Effe Ad Ava	ed appropriately ective in dust cor ministrative co	Y NC ntrol Y NC ntrols	1 1 1 1						
Use Effe Ad Ava Use	ed appropriately ective in dust cor ministrative co ailable at site	Y□ N□ htrol Y□ N□ ntrols Y□ N□ Y□ N□	1 1 1 1 1						
Use Effe Ad Ava Use	ed appropriately ective in dust cor ministrative co ailable at site ed appropriately	Y□ N□ htrol Y□ N□ ntrols Y□ N□ Y□ N□	1       1       1       1       1       1						
Use Effe Ad Ava Use In p	ed appropriately ective in dust cor ministrative co ailable at site ed appropriately place before wor	Y NC ntrol Y NC ntrols Y NC Y NC k start Y NC	1       1       1       1       1       1						

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Large pieces picked up	Y□ N□	
Vacuum capacity maintained	Y□ N□	
Pre-filters in place	Y□ N□	
Vacuum attachments used	Y□ N□	
Collection bags in place	Y□ N□	
Waste properly disposed of	Y□ N□	

TAE	TABLE 1 (Codes for task/risk management matrix)								
Engineering controls		Adn	Administrative controls		PPE		Supplies/Equipment		
1	Exhaust fan	1	Signage	1	Respirator	1	Hand grinder		
2	LEV	2	After hours work	2	Gloves	2	Ceiling grinder		
3	Wetting	3	Scheduling	3	Coveralls	3	Floor grinder		
4	Partial enclosure			4	Hearing protection	4	Disposal bags		
5	Full enclosure			5	Eye protection	5	HEPA filter (vacuum)		
6	Shroud			6	Reflective vest	6	HEPA filter (respirator)		
7	Barriers			7	Rubber boots (CSA)	7	Shovel		
				8	Fall arrest	8	Lifeline		

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SI	TE-SPECIFIC SILICA	EXPOSURE CONTR	OL PLAN			
Location:	Date:					
Work description:						

Primary silica control options (check those options used and explain use if needed)

• Substitution controls (using procedures or products that do not create silica; must review MSDSs)

Other means of demo: Different products: Other substitutions:	
other substitutions.	
<ul> <li>Engineering controls (who Vacuuming:</li> </ul>	en using ventilation, draw air out and don't expose others to exhaust dusts)
Wetting:	
Ventilation:	
Isolation:	
Other means:	

• Administration controls (reducing exposure by work schedules, timing, or planning options)

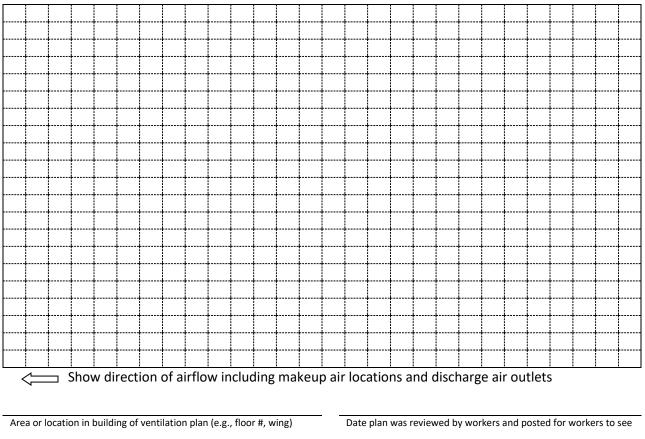
Control points	s:
Work schedul	e:
Other means:	

Secondary silica control options (check those options used and explain use if needed)

<ul> <li>Personal protective equipment</li> </ul>	ent	
Half-mask respirators:	Cartridge type:	Fit tests confirmed:
Full-face respirators:	Cartridge type:	Fit tests confirmed:
Supplied air units:		
Coveralls required:		
Water or washing facilities Vacuuming clothing/self:	on site:	
Safe work procedures details:	and other	

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# Ventilation plan (sketch)



Types of neg. air fans & no.'s \*

\* Indicate on plan by number the location of the negative air fans

#### Ventilation safety checklist

□ Makeup air free of possible contaminants

 $\hfill\square$  Exhaust fan operation has failure warning

Dilution fans not stirring up dust

□ Wetting of materials used to keep dust down

- inlet ports
  - Discharge air not affecting others
  - $\hfill\square$  All workers equipped with approved respirators

Workers not placed between contaminants created and exhaust

Note: Attach additional sheets if needed or other documents if required due to hazards or work conditions.

Print supervisor's name

Supervisor's signature

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# Purpose

The purpose of an exposure control plan (ECP) is to set out our approach to protecting workers from harmful exposure to airborne silica dust.

A combination of control measures will be required to achieve this objective. We commit to being diligent in our efforts to select the most effective control technologies available, and to ensure that the best practices, as described in this ECP, are followed at our worksites.

The work procedures we establish will protect not only our workers but all workers on our worksites.

# **Key Responsibilities**

Due to the significant risk posed by respirable silica, it is critical that all personnel involved in operations that could potentially create silica dust take specific action to ensure that, as much as possible, a hazard is not created.

#### Waco, Inc. is responsible for:

- Substitution of less hazardous products for those that contain crystalline silica is required.
- Ensuring that the materials (e.g., tools, equipment, personal protective equipment) and other resources (i.e., worker training materials) required to fully implement and maintain this exposure control plan (ECP) are readily available where and when they are required.
- Providing a job-specific ECP for each project, which outlines in detail the work methods and practices that will be followed on each site. Considerations will include
- Availability and delivery of all required tools/equipment
- Scope and nature of grinding work to be conducted
- Control methods to be used and level of respiratory protection required
- Coordination plan
- Conducting a periodic review of the effectiveness of the ECP. This would include a review of the available dust-control technologies to ensure these are selected and used when practical.
- Initiating sampling of worker exposure to concrete dust when there are non-standard work practices for which the control methods to be used have not been proven to be adequately protective.
- Ensuring that all required tools, equipment, and personal protective equipment are readily available and used as required by the ECP.
- Ensuring supervisors and workers are educated and trained to an acceptable level of competency.
- Maintaining records of training, fit-test results, crew talks, and inspections (equipment, PPE, work methods/practices).
- Coordinating the work with the prime contractor and other employers to ensure a safe work environment.

#### The supervisor (foreman and lead hand) is responsible for:

• Obtaining a copy of the ECP from the employer, and making it available at the worksite

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- Selecting, implementing, and documenting the appropriate site-specific control measures
- Providing adequate instruction to workers on the hazards of working with silica-containing materials (e.g., concrete) and on the precautions specified in the job-specific plan covering hazards at the location
- Ensuring that workers are using the proper respirators and have been fit-tested, and that the results are recorded
- Directing the work in a manner that ensures the risk to workers is minimized and adequately controlled
- Communicating with the prime contractor and other sub-contractors to ensure a safe work environment

#### The worker is responsible for:

- Knowing the hazards of silica dust exposure
- Using the assigned protective equipment in an effective and safe manner
- Setting up the operation in accordance with the site-specific plan
- Following established work procedures as directed by the supervisor
- Reporting any unsafe conditions or acts to the supervisor
- Knowing how and when to report exposure incidents

# **Silica Properties**

Silica is the second most common mineral on earth and makes up nearly all of what we call "sand" and "rock." Silica exists in many forms—one of these, "crystalline" silica (including quartz), is the most abundant and poses the greatest concern for human health. Some common materials that contain silica include:

- Rock and sand
- Topsoil and fill
- Concrete, cement, and mortar
- Masonry, brick, and tile
- Granite, sandstone, and slate
- Asphalt (containing rock and stone)
- Fibrous-cement board containing silica

Silica is a primary component of many common construction materials, and silica-containing dust can be generated during many construction activities, including:

- Abrasive blasting (e.g., of concrete structures)
- Jackhammering, chipping, or drilling rock or concrete
- Cutting brick or tiles
- Sawing or grinding concrete
- Tuck point grinding
- Road construction
- Loading, hauling, and dumping gravel
- Demolition of structures containing concrete
- Sweeping concrete dust

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Unprotected workers performing these activities, or working in the vicinity, can be exposed to harmful levels of airborne silica. Workers in other industries can also be exposed to silica, for example in the manufacture of toothpaste or pottery, or when loading coal (which can contain quartz) into the hold of a ship.

## Health Hazards

Exposure to silica has been shown to cause silicosis, lung cancer, pulmonary tuberculosis and other airway diseases. Crystalline silica dust can cause a disabling, sometimes fatal disease called silicosis. The fine particles are deposited in the lungs, causing thickening and scarring of the lung tissue. The scar tissue restricts the lungs' ability to extract oxygen from the air. This damage is permanent, but symptoms of the disease may not appear for many years.

A worker may develop any of three types of silicosis, depending on the concentrations of silica dust and the duration of exposure:

- Chronic silicosis—develops after 10 or more years of exposure to crystalline silica at relatively low concentrations
- Accelerated silicosis—develops 5 to 10 years after initial exposure to crystalline silica at high concentrations
- Acute silicosis—develops within a few weeks, or 4 to 5 years, after exposure to very high concentrations of crystalline silica

Initially, workers with silicosis may have no symptoms; however, as the disease progresses, a worker may experience:

- Shortness of breath
- Severe cough
- Weakness

These symptoms can worsen over time and lead to death. Exposure to silica has also been linked to other diseases, including bronchitis, tuberculosis, and lung cancer.

# Code of Practice

Waco, Inc. has a code of practice governing the storage, handling, use and disposal of silica if there is potential for exposure. The code of practice includes measures to be used to prevent the uncontrolled release of silica and the procedures to be followed if there is an uncontrolled release. Engineering controls such as ventilation or wet methods must be used to control silica-containing dusts.

#### **Risk Identification, Assessment and Control**

The potential for worker exposure to silica should be identified during the hazard assessment. A worker's exposure to silica is kept as low as reasonably achievable. Employees must not be exposed to airborne concentrations of silica in excess of 0.025 mg/cubic meter over an 8 hour time period. Atmospheric testing results should be assessed before a worker is exposed.

A key step in developing a silica exposure control plan is to identify the work activities that would put workers at risk of exposure.

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- Work activities that may generate airborne silica dust—for silica, the route of exposure is through the inhalation of airborne dust. The employer should have a qualified person review the planned work activities to identify those that may generate airborne silica.
- Identify workers at risk of exposure—For example, workers who finish concrete would be at greater risk of exposure than plumbers or electrical workers.
- Amount of exposure—some work activities generate more dust than others, and the amount of exposure should be estimated. Published resources are available that provide air sampling data and compare silica dust levels from various construction activities.
- Duration of exposure—Workers who grind concrete for a full shift would be at greater risk than workers jackhammering for an hour.

# **Control Options**

Effective control options must be used to eliminate or reduce the risk to workers from the hazards of silica dust exposure. The following hierarchy of control measures must be followed:

- Elimination/substitution (e.g., using products with less silica or using work methods that would eliminate the need for surface grinding)
- Engineering controls (e.g., water, local exhaust ventilation, enclosure)
- Administrative controls (e.g., coordination of tasks with subcontractors, signage)
- The use of proper PPE such as gloves, coveralls and eye protection when exposed to silica. Personal protective equipment such as gloves, coveralls and eye protection will be used to control silica exposures.

Our firm commits to developing knowledge and expertise about these controls, and to establishing policies/procedures to protect workers from harmful exposure and to minimize reliance on respirators. Effective engineering controls such as HEPA vacuum attachments and wetting methods, which control silica dust at its source, are readily available. These controls have been proven to reduce airborne dust levels significantly when selected and operated in accordance with best practices. We know that engineering controls alone do not reduce airborne silica to safe levels; so in most cases other control measures, including respiratory protection, will be necessary.

If we take on a job that could release an unusually high amount of dust, and we are unsure of the adequacy of our control measures, we will conduct air sampling in order to ensure that control methods are protective.

We will reduce or eliminate worker exposure to silica dust by selecting a combination of the following controls listed in order of preference:

- Elimination and substitution
- Engineering
- Administrative
- Personal protective equipment

# Elimination and Substitution

We recognize the importance of planning the work in order to minimize the amount of silica dust generated. During the project planning phase, we will advocate for the use of methods that reduce the need for cutting,

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grinding, or drilling of concrete surfaces (e.g., formwork planning). Whenever possible, we will schedule work when concrete is still wet, because we know that much less dust is released at that time.

# Engineering Control of Dust

Selecting an appropriate control measure depends on the specifics of the operation. In some cases, local exhaust ventilation (LEV) is more effective at controlling exposure (e.g., during grinding operations) than wetting methods. In a different application, wetting may be more effective (e.g., during cutting operations) than LEV. However, using LEV may reduce the amount of final cleaning required, as the silica dust is captured.

Our dust control systems may employ three well-established techniques:

- Local exhaust ventilation (LEV)
- Wet dust suppression (WDS)
- Restricting or isolating the work activity with barriers or full enclosures (this may be the only option where LEV or WDS is not practical or effective)

#### Local Exhaust Ventilation (LEV)

When LEV is used in our work, we will employ the following systems and safe work practices:

- Vacuum attachment systems to capture and control the dust at its source whenever possible.
- Dust control systems (used regularly and well maintained).
- Grinding wheels operated at the manufacturers' recommended rpm (operating in excess of this can generate significantly higher airborne dust levels).
- Retrofit shrouds or exhaust cowlings for corner grinding; use manufacturer-specified rpm speeds and a well-maintained HEPA vacuum.
- Diamond stone grinders, which allow for the use of a more efficient suction casing on the grinder, whenever practicable.
- HEPA or good quality, multi-stage vacuum units approved for use with silica dust. [The vacuum units should be capable of creating a target airflow of at least 70 cfm. This should achieve a face velocity at the shroud of about 1.3 m/s (260 fpm)—the higher the face velocity, the more dust captured at source.]
- Work planning, so that concrete grinding can be completed when wet (dust release can be significantly reduced).
- Good housekeeping work practices (for example, use vacuums with high-efficiency particulate air (HEPA) filters, or use wet sweeping).
- Train workers and supervisors on how to properly use and maintain the equipment.

#### Wet methods for Dust Control

When water spray systems are used in our work, we will follow these safe work practices:

- Pneumatic grinders will be used instead of electric-powered grinders if water is the method of control.
- Pressure and flow rate of water will be controlled in accordance with tool manufacturers' specifications (for cutting saws, a minimum of 0.5 liters of water per minute should be used).
- When sawing concrete or masonry, we will use only saws that provide water to the blade.
- Wet slurry will be cleaned from work surfaces when the work is completed, using a wet vacuum or wet sweeping.

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## Barriers and Enclosures

When barriers or enclosures are used in our work, we will follow these safe work practices:

- The site foreman will determine the type and design of barrier or enclosure (based on the work activity and the work area) and ensure it is constructed in accordance with the work plan. Barriers may be simple hazard-flagging ribbon or more restrictive hoarding.
- We will use commercially available negative air units when constructing a full enclosure.

#### Administrative Controls

We will follow these safe work practices:

- Exposure control plans and the site risk assessment/work plan will be submitted to the general contractor prior to the start of work.
- We will establish procedures for housekeeping, restricting work areas, personal hygiene, worker training, and supervision.
- As part of our project planning, we will assess when silica dust may be generated and plan ahead to eliminate or control the dust at the source. We recognize that awareness and planning are key factors in the prevention of silicosis.
- Warning signs will be posted to warn workers about the hazards of silica and to specify any protective equipment required (for example, respirators).
- Work schedules will be posted at the boundaries of work areas contaminated with silica dust.
- Work that generates silica dust will be conducted after hours, when access to other unprotected workers cannot be restricted.
- We will develop a site-specific exposure control plan to cover project-specific issues (e.g., scope of work, project location and site-specific hazards) and to be kept available at the worksite.

#### Personal Protective Equipment

#### Respiratory protection

- All workers who wear respirators will do so in adherence with our respirator program.
- Respirators must be selected based upon measured exposure levels and the assigned protection factor of respirators.
- Only approved respirators will be used.
- Workers who wear respirators will be clean-shaven. Filtering face piece respirators give little or no protection to workers with beards, and even a minor growth of stubble can severely reduce the effectiveness of respiratory protection.
- All workers who wear respirators will be fit-tested.
- Workers will be properly trained in the use of respirators, and a high standard of supervision, inspection, and maintenance will be followed.

#### Protective clothing

Waco, Inc. will provide workers in a restricted area with protective clothing that protects other clothing worn by the worker from silica contamination, ensure that workers' street clothing is not contaminated by silica, and ensure that a worker does not leave a restricted area until the worker has been decontaminated.

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# Health monitoring

Exposures to airborne concentrations of Silica must be kept below the permissible exposure limits shown in 29 CFR 1910.1000 Table Z-3.

Full shift personal samples shall be representative of the employee's regular, daily exposure to silica.

#### Documentation

Records must be kept of the following:

- All workers who are exposed to respirable silica dust while on the job
- Worker education and training sessions
- Respirator fit-testing
- Equipment maintenance and repair
- Worksite inspections

The exposure control plan must be reviewed at least annually and updated as necessary by the employer, in consultation with the workplace health and safety committee or the worker health and safety representative.

#### **Education and Training**

A worker who may be exposed to silica is to be informed of the health hazards associated with exposure to that substance, is informed of measurements made of airborne concentrations of harmful substances at the work site, and is trained in procedures developed by Waco, Inc. to minimize the worker's exposure.

Training is required prior to using silica-containing materials or working in an environment known to contain airborne concentrations of Silica. Periodic refresher training is also required. We will train all silica dust in the following:

- Hazards associated with exposure to silica dust
- The risks of exposure to silica
- Signs and symptoms of silica disease
- Safe work procedures to be followed (e.g., setup of enclosures, disposal of silica waste, personal decontamination)
- Use of respirators and other personal protective equipment (e.g., donning and doffing of personal protective equipment, and cleaning and maintenance of respirators)
- Use of control systems (e.g., LEV and wet methods)
- How to seek first aid (for example, the location and use of eyewash stations)
- How to report an exposure to silica dust

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# CONTROL PLAN

Date control plan completed:						
Prime contractor:			Superintendent:			
Project manager:			CSO/First aid attendant:			
Project:	Add	ress:				
Company completing work:						
Address:			Conta	ict:		
Contact phone:			Contact fax:			
On-site supervisor(s):						
Worker(s):						
Scope of work to be completed:						
Work start date:			Duration:	🗆 Days 🗖 Months 🛛	☐ Years	
Employer responsible for:						
Supervisor responsible for: Worker responsible for:						
HAZARDS IDENTIFIED (other than si	lica <b>co</b>	NTROL MEAS	SURE(S)			
Falls						
Slipping						
Confined space						
Workers above						
Workers below						
□ Noise						
Electrical						
Overview of work procedure (How are	you goin	g to work safe	ely?):			
Workers trained in (training records mu	ıst be avai	lable for revi	ew):		1	
Proper use of grinding equipment		Y□ N□	Proper use of admin	controls	Y N	
Proper use of engineering controls		Y□ N□	Proper use of PPE		Y N N	
Proper disposal methods		Y□ N□	Other (fall protection	n, swing stages, etc.)	Y N N	
Respirators (Refer to ECP for respirator	requireme	ents)				
Required: Y N	Available	e: Y🗆 N 🗆		Fit-tested: Y□ N□		

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PPE required for scope of work (other than respirator)										
□ Coveralls □ Gloves □ Rubber boots □ Eye protection □ Reflective vest □ Hearing protection										
						Reflective	vest 🗆 Heari	ng protect	lon	
			ttached to control p				Training race			
			l program 🗖 Respir	atory	protection pro				VP (tools and	equipment)
Pro	oject mai	nageme	nt signature			Positio	ו:		Date:	
Со	ntractor	supervis	sor signature			Positio	ו:		Date:	
Tas	sk/risk m	anagem	ent matrix (relating	to silic	a dust) use tabl	e 1 for co	des, separate v	with a com	ima (,)	
#	Date/Du	uration	Task		Controls				PPE	Supplies/
	,				Engineering		Administrative			Equipment
			management matrix a							
SIT	E INSPE	CTION C	HECKLIST (complete	pre-w	ork & periodica	lly during	project)			
Eng	gineering	g contro	ls		Problem not	ed (deta	IL)	Probler	m corrected	(DETAIL)
Ava	ilable at	site	Y	NΠ						
Оре	erating co	orrectly	Υ	NΠ						
Use	ed approp	oriately	Υ	NΠ						
Effe	ective in c	lust cont	rol Y	NΠ						
Ad	ministra	tive con <sup>-</sup>	trols							
	ilable at			NΠ						
Use	ed approp	oriately		NΠ				1		
	lace befo			NΠ				1		
-	ective			NΠ				1		
	anup									
	cuum use	d proper	y Y	NΠ						
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Large pieces picked up	Y□ N□	
Vacuum capacity maintained	Y N N	
Pre-filters in place	Y N N	
Vacuum attachments used	Y N N	
Collection bags in place	Y□ N□	
Waste properly disposed of	Y N N	

TAE	<b>TABLE 1</b> (Codes for task/risk management matrix)						
Eng	ineering controls	Adr	ninistrative controls	PPE	PPE		plies/Equipment
1	Exhaust fan	1	Signage	1	Respirator	1	Hand grinder
2	LEV	2	After hours work	2	Gloves	2	Ceiling grinder
3	Wetting	3	Scheduling	3	Coveralls	3	Floor grinder
4	Partial enclosure			4	Hearing protection	4	Disposal bags
5	Full enclosure			5	Eye protection	5	HEPA filter (vacuum)
6	Shroud			6	Reflective vest	6	HEPA filter (respirator)
7	Barriers			7	Rubber boots (CSA)	7	Shovel
				8	Fall arrest	8	Lifeline

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# SITE-SPECIFIC SILICA EXPOSURE CONTROL PLAN

Location: Date: \_\_\_\_\_ Work description: **Primary silica control options** (check those options used and explain use if needed) Substitution controls (using procedures or products that do not create silica; must review MSDSs) Other means of demo: Different products: Other substitutions: • Engineering controls (when using ventilation, draw air out and don't expose others to exhaust dusts) Vacuuming: Wetting: Ventilation: Isolation: Other means: Administration controls (reducing exposure by work schedules, timing, or planning options) Control points: Work schedule: Other means: Secondary silica control options (check those options used and explain use if needed) Personal protective equipment Half-mask 

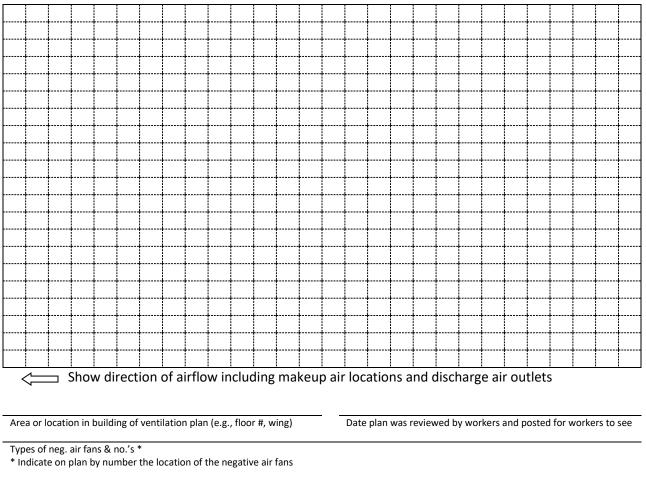
 respirators:
 Cartridge type:
 Fit tests confirmed:

 Full-face respirators:
 Cartridge type:
 Fit tests confirmed:

 Supplied air units: Coveralls required: • Hygiene and decontamination options (reducing exposures after work has stopped or during breaks) Water or washing facilities on site: Vacuuming clothing/self: Safe work procedures and other details:

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# Ventilation plan (sketch)



Ventilation safety checklist

□ Makeup air free of possible contaminants

 $\hfill\square$  Exhaust fan operation has failure warning

Dilution fans not stirring up dust

 $\hfill\square$  Wetting of materials used to keep dust down

- Workers not placed between contaminants created and exhaust inlet ports
- Discharge air not affecting others
- $\hfill\square$  All workers equipped with approved respirators

Note: Attach additional sheets if needed or other documents if required due to hazards or work conditions.

Print supervisor's name

Supervisor's signature

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SPILL PREVENTION / RESPONSE			Next Review Date:	02/01/2025
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# Purpose

The purpose of this plan is to document spill prevention and response requirements. Each Waco, Inc. work site will develop a spill prevention and response plan based on the requirements and template provided.

#### Scope

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

#### Requirements

Each work site spill prevention and response plan shall contain the following requirements.

- Chemical substances should be stored in proper containers to minimize the potential for a spill. Whenever possible, chemicals should be kept in closed containers and stored so they are not exposed to storm water.
- The program must identify chemicals used that may be potentially spilled or released. This will include both liquid chemicals used at our facilities or brought on to owner client sites.
- Spill kits must be adequate for any anticipated spills. A proper spill kit must contain the appropriate supplies for materials that may be spilled. Supplies must be easily accessible when required, and considerations must be made for both the type and quantity of materials. The contents of spill response kits shall be periodically assessed to ensure the availability of adequate spill response supplies and adjust inventory as necessary.
- Waco, Inc. shall ensure the availability of adequate spill response supplies by periodic inspection to assess their availability and adjust the inventory as necessary.
- Employees must be instructed on spill prevention and the proper response procedures for spilled materials. The training should include materials available for use, proper waste disposal and communication procedures.
- Areas where chemicals may be used or stored must be maintained using good housekeeping best management practices. This includes, but is not limited to clean and organized storage, labeling and secondary containment where necessary.
- Proper communication measures for employees to initiate in the event of a spill will be created on a site by site basis. Communication procedures will be based on type and quantity of materials spilled.
- Environmental spills shall be reported to environmental authorities when required. Reporting procedures will be based on type and quantity of materials spilled.

The following template shall be used for each work site.

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# Copies of this plan are located at the facility and are available to all employees.

Location(s) of plan(s):
Facility Information
Facility Name:
Mailing Address:
Physical address if different:
Owner Name:
Owner Address:
Primary Contact Name: Work Phone Number: Home Phone Number: Mobile Phone Number:
Secondary Contact Name: Work Phone Number: Home Phone Number: Mobile Phone Number:
Date of Initial Operation:
Site Assessment Location - Describe where facility is located.

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#### **Facility Description**

Facilities and Equipment (examples are shown but complete per site description):

<ul> <li>Garage for vehicle processing</li> <li>Parts storage</li> <li>Manufacturing Building</li> <li>Spill kit/emergency equipment</li> <li>Refrigerant (Freon) extractor</li> <li>Parts washer</li> </ul>	Please list:
<ul> <li>Dismantler/Recycler</li> <li>Equipment Repair</li> <li>Moving Equipment</li> <li>Painting/Sandblasting</li> <li>Manufacturing</li> </ul>	Please list:

Fixed Storage - List capacity and contents of each storage container. For example, "One 6,000 gallon above ground tank containing diesel fuel." Be sure to include diesel, gasoline, waste oil, heating oil, kerosene, paint thinner and other solvents. Also describe the construction of the containers, secondary containment for each, liquid level indicators, alarms and method of corrosion protection for each container.

Non-Fixed Storage - List capacity and contents of each storage container. For example, "One 55 gallon drum for recycled oil." Be sure to indicate what each container is used for, its condition and construction and how secondary containment is provided.

Total quantity of stored materials: - The combined quantity of the materials listed above: \_\_\_\_\_\_ gallons

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#### Oil spill history

Place an X on the appropriate line and proceed accordingly.

\_\_\_\_ There has never been a significant spill at the above named facility.

\_\_\_\_ There have been one or more significant spills at the above named facility. Details of such spill(s) are described below. For each spill that occurred, supply the following information:

- Type and amount of oil spilled
- Location, date and time of spill(s)
- Watercourse affected
- Description of physical damage
- Cost of damage
- Cost of clean-up
- Cause of spill
- Action taken to prevent recurrence

# **Potential Spill Volumes and Rates**

Fill in all applicable blanks.

Potential Event	Volume Released	Spill Rate
Complete failure of a full tank* Partial failure of a full tank* Tank overflow** Leaking during unloading*** Pipe failure**** Leaking pipe or valve**** Fueling operations**** Oil and grease	gallons 1 to gallons 1 to gallons up to gallons up to gallons several ounces to gallons several ounces to gallons several ounces to quarts	instantaneous gradual to instantaneous up to gallons per minute up to gallons per minute up to gallons per minute up to gallons per minute spotting

- \* Volume of largest tank
- \*\* Calculate using the rate at which fuel is dispensed from the delivery truck into your tank(s).
- \*\*\* Calculate using the rate at which petroleum would be withdrawn from the tank if it should have to be emptied (*e.g.*, if it was being taken out of service).
- \*\*\*\* Calculate based on the specifications of your equipment.

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#### **Spill Prevention and Control**

Spill Prevention - Provide specific descriptions of containment facilities and practices. Include description of items such as double-walled tanks, containment berms, emergency shut-offs, drip pans, fueling procedures and spill response kits. Also, describe how and when employees are trained in proper handling procedures and spill prevention and response procedures.

Spill discharge and flow - For each potential spill source; describe where petroleum would flow in the event of a spill. For example, "The 6,000 gallon diesel tank has a pre-manufactured secondary containment system capable of holding 110 percent of the total volume of the tank" and, "A spill from engine repair would be contained inside the shop building and quickly cleaned up with oil absorbents." Incorporate site map by reference (see instructions under *Appendices*).

Spill response - Identify what equipment would be deployed by whom and in what situation. Also, include phone numbers for response agencies, *e.g.*, U.S. Coast Guard, fire department, spill response contractors, etc. A copy of your spill response plan may be attached as an appendix to this plan in lieu of completing this section.

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Security - Provide a description of how all containers are protected when the facility is not in operation or unattended. Include a description of fencing, access control, gates, locks, etc. that prevent access by unauthorized individuals.

#### Facility Inspections

Routine Inspections - Name facilities and the frequency with which they are inspected. For example, "The fuel pumps are inspected daily. The materials storage area is inspected monthly." Describe all facility containers, piping, etc. that is to be inspected. Name the person who has responsibility to implement preventative maintenance programs, oversee on-site inspections, coordinate employee training, maintain records, update the plan as necessary, and ensure that reports are submitted to the proper authorities.

Annual Inspections - Include a description of annual comprehensive inspections. For example, "A site inspection is also conducted annually by appropriate responsible personnel to verify that the description of potential pollutant sources are accurate, that the map reflects current site conditions, and that the controls to reduce the pollutants identified in this plan are being implemented and are adequate. This annual inspection will be conducted above and beyond the routine inspections done focusing on designated equipment and areas where potential sources are located."

#### **Record Keeping**

Describe record keeping procedures. For example, "Record keeping procedures consist of maintaining all records a minimum of three years. The following items will be kept on file: current plan, internal site reviews, training records, and documentation of any spills or maintenance conducted in regards to these sites." *Maintenance Inspection, Employee Training,* and *Record Keeping* logs are included in this template for your use.

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# Maintenance Inspections

Maintenance Coordinator Name:

Maintenance Coordinator responsibilities include implementation of preventative maintenance programs and oversight of on-site inspections.

Use this table to record inspections:

Facility Inspected	Date of Inspection	Name of Inspector	Result Pass/Fail	Comments

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# Employee Training

Employee Training Coordinator Name: \_\_\_\_\_

Use this table to record spill prevention and response training.

Name of Employee	Date of Training	Type of Training/Topics Addressed

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## Record Keeping of Incidental Spills

Record Keeper Name:

Record Keeper responsibilities include maintaining records of incidents, updating the plan as necessary and ensuring reports are submitted to the proper authorities when necessary.

Incident No.	Type of Incident	Date of Occurrence	How it was Cleaned Up

#### **Appendices**

Site map - Attach a site map as Appendix A to this plan. You may attach an existing site map or create your own. If you use an existing map, be sure that the items listed below are included. If you need to create a site map, use a large enough piece of paper so all site plan elements may be seen and try to keep the map to a scale (e.g. 1'' = 20' The following instructions should guide you step-by-step. Please use a straight edge (ruler) while creating the sketch.

- The sketch should be oriented as if you were in a plane looking down on your property (an aerial view), with North at the top (draw an arrow indicating north).
- Draw and label all roadways surrounding the work site.
- Draw and label all facilities within the work site as close proportionately as possible.
- Draw an arrow(s) pointing in the direction of downhill flow of water when it rains.
- Draw the location and general layout of all vehicles associated with the work site.
- Label any rivers or waterways surrounding the work site.
- Draw and label all methods of entry to the work site.
- Draw and label the location of all fuel containment facilities.
- Draw and label the location of all in-place spill prevention, control and countermeasure devices.

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Other attachments - List any additional information to be attached as Appendix B, C, D, etc. Label and staple the attachments to the end of this plan.

#### Management Approval

I certify that I have personally examined and am familiar with the information submitted in this document and that, based on my inquiry of those individuals responsible for obtaining this information, the information submitted is true, accurate and complete.

Signature

Title

Printed name

Date

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STOP WORK AUTHORITY			Revision No.	2
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# Purpose

The Stop Work Authority process involves a stop, notify, correct and resume approach for the resolution of a perceived unsafe condition, act, error, omission or lack of understanding that could result in an undesirable event. All Waco, Inc. employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health, safety or environmental risks exist.

# Scope

This program applies to all Waco, Inc. projects and operations.

# **Key Responsibilities**

- Employees are responsible to initiate a Stop Work Intervention when warranted and management is responsible to create a culture where SWA is exercised freely.
- Supervisors are responsible to ensure a culture is created where SWA is exercised and honored freely to resolve issues before operations resume and recognize proactive participation.
- Management must establish and support clear expectations to exercise SWA, create a culture where SWA is exercised freely and hold those accountable that chose not to comply with established SWA policies.

# Stop Work Authority Procedure

- When an unsafe condition is identified the Stop Work Intervention will be initiated, coordinated through the supervisor, initiated in a positive manner, notify all affected personnel and supervision of the stop work issue, correct the issue and resume work when safe to do so.
- No work will resume until all stop work issues and concerns have been adequately addressed.
- Any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority will not be tolerated by the host nor by Waco, Inc..

# Follow-Up

- All Stop Work Interventions shall be documented for lessons learned and corrective measures to be put into place.
- Stop Work reports shall be reviewed by supervision order to measure participation, determine quality of
  interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate
  sharing of learning.
- It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been
  addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be
  adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective
  actions may be required to identify and address root causes.

# Training

Employees shall receive Stop Work Authority training before their initial assignment. The training will be documented including the employee name, the dates of training and subject matter.

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# **STOP WORK FORM**

Section 1: Stop Work Issua	ince		
Location of operation		Date & Time	
Supervisor		Phone	
Person initiating stop work			
Person performing work			
Work operation or condition (	include names of individuals performing	J work)	
Hazard (as stated by person	initiating stop work)		

Section 2: Date / Time Informed				
Supervisor		Safety Manager		
Area Manager		Client Safety (If required)		

Section 3: Follow-up Action	Section 3: Follow-up Action (Be specific – what by, who by, when by to correct hazard)				
Section 4: Restart Concurr	ence				
Supervisor		Date			
Area Manager		Date			
Safety Manager		Date			

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# Purpose

The purpose of this program is to ensure that Waco, Inc. continues to improve subcontractor health, safety and environmental performance and to establish a standard for pre-qualification, evaluation/selection and development of our subcontractors.

#### Scope

This program applies to all subcontractors and all Waco, Inc. locations.

#### **General Requirements**

All Waco, Inc. subcontractors are to be managed in accordance with this program.

The use of subcontractors must be pre-approved by Waco, Inc. Approval requirements include:

- A formal safety review of the subcontractor being performed by Waco, Inc. safety department.
- The scope of the review was commensurate with the hazards and risk exposure.
- Subcontractor has been/will be oriented to the safety policies, expectations and requirements of Waco, Inc.
- The subcontractor agrees to abide by our Drug and Alcohol policy and onsite safety rules throughout the duration of the work.

Any subcontractor that has a "Non-Approved" safety status will not be used on any Waco, Inc. site.

#### Procedure

#### **Pre-Qualification of Subcontractors**

Subcontractors will be pre-qualified by reviewing their safety programs, safety training documents and safety statistics.

#### How Acceptable Safety Metrics Will be Used as a Criteria for Selecting Subcontractors

Acceptable safety metrics will be used as criteria for prequalifying and selecting subcontractors in the following manner. The safety metrics and scoring will consider:

- Waco, Inc. Subcontractor Safety Pre-Qualification Form responses and subcontractor safety program documents review 60% (Rated from 0-60 total points)
- Subcontractor safety training documents review 20% (Rated from 0-20 total points)
- Subcontractor safety statistics review 20% (Rated from 0-20 total points)

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## **Evaluation Rating and Acceptance**

The subcontractor rating system will have five designations:

- Equal to or Greater than 90 points = A no restrictions.
- Between 85 and 89 points = B Mitigation plan must be documented and approved by Waco, Inc. Safety.
- Between 81 and 84 points = C Mitigation plan must be documented and approved by Waco, Inc. Safety; management approval in writing.
- Between 71 and 80 points = D Mandatory commitment meeting with senior subcontractor management present; mitigation plan documented and approved by Waco, Inc. Safety; management approval in writing; trained subcontractor safety personnel on site during work regardless of number of workers.
- Less than 70 points = F not to be used.

Once each subcontractor has been evaluated and scored, Waco, Inc. safety will provide management the scores/ranking.

Waco, Inc. reserves the right to change a subcontractor's status to "Non-Approved" if the subcontractor shows insufficient progress towards accepted mitigation plan or other agreed upon criteria.

#### Subcontractor Involvement

Contractors are required to follow or implement the work practices and systems described below while performing work at Waco, Inc. worksites:

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

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# SUBCONTRACTOR SAFETY PRE-QUALIFICATION FORM

1. Subcontractor Infor			
Subcontractor Name:		Telephone Numb	er:
Street Address:		Fax Number:	
City:		Website Address	:
Province/State: Postal Code/Zip:			
2. Officers			
President:			
Vice President:			
Treasurer:			
3. How many years ha	s your organization be	en in business under yo	ur present firm's name?
4. Parent Firm Name:			
City:	Province/St	ate:	Postal Code/Zip:
Subsidiaries:			
5. Under current mana	gement since (Date):	(please enter da	ate as mm/dd/yyyy)
6. Contact for Insurance	ce Information:		
Title:	Telephone:	Fax:	Email:
7. Insurance Carrier(s)			
Name		be of Coverage	Telephone
		0	· · · · · · · · · · · · · · · · · · ·
8.         Worker's Compensation Account Status (Please enclose a copy of your workers compensation insurance certificate.           Account Number:         Industry Code:			
9. Contact for requesting bids:			
9. Contact for requesti Title:	Telephone:	Fax:	Email:
Thus.	relephone.	· ·	
10. Contractor Evaluation	form completed by:		
Title:	Telephone:	Fax:	Email:

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	HEALTH, SAFETY AND ENVIRO	NMENTAL PER	FORMANCE			
Heal	Health, Safety and Environmental Performance					
	Provide the following data for your firm using your record keeping forms from the past three (3) years.					
If the	If the data is not available please reply with Not Available - N/A.					
-	Safety Performance Definitions and Guidance					
а.	Hours Worked Employee hours worked last three ye	ears. Please repo	rt actual scheduled t	total hours worked		
	and total overtime hours worked. If actual hours work may be estimated. A default of 2000 hours per individ					
b.	<b>Recordable Incidents</b> Recordable cases are those					
Ы.	death but excluding first-aid injuries.		work-related injury o	r miless, meluumy		
c.	Lost Workday Cases A Lost Workday Case is a me	edical case that in	volves fatalities, day	s away from work		
	cases or restricted work activity cases.		, ,	,		
	• Days Away from Work Case Where the employ	ee is away from so	cheduled work day o	ne day or more		
	after the day of a work related injury or illness. The					
	Stop count when total days away and restricted d					
	<u>Restricted Work Activity Case</u> Where the empl		vork-related injury or	illness:		
	<ul> <li>Assigned to another job on a temporary or period</li> </ul>					
	Worked at their permanent job but less than a Could not perform mutice functions		and inh			
	<ul> <li>Could not perform routine functions associate The day of the incident is not counted as a Res</li> </ul>			otal dave away or		
	restricted duty days reach 180 or if employee leave		Stop count when t	olai uays away oi		
d.	Motor Vehicle Incident A motor vehicle is any med		ically powered devic	es (excludina one		
	moved by human power), upon which or by which a					
	roadway.	, , ,	, , , ,	•		
	Motor Vehicle Incident Includes any event invol					
	the firm that results in death, injury or property da	mage unless the v	ehicle is properly pa	rked.		
Heal	th and Safety Incidents	2009	2008	2007		
	Tradition of March 1					
a.	Total Hours Worked					
b.	Total Recordable Incidents					
	alities dical Aids					
	ys Away from Work Cases					
	stricted Work Activity Cases					
<i>c</i> .						
	Total # Recordable Incidents x 200,000					
Total	Total # Hours worked					
d.						
	# Fatalities					
	ys Away from Work Case					
	stricted Work Activity Case					
e.	Lost Workday Incident Rate (LWDR)					
	# Lost Workday Incidents x 200,000					
1 1010	# Hours Worked					

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HEALTH, SAFETY AND ENVIRONMENTAL PERFORMANCE						
Health and Safety Incidents - continued	2010	2009	2008			
f. Motor Vehicle Incidents (MVI)						
# Motor Vehicles Incidents						
# Kilometers/Miles driven						
g. Motor Vehicle Incident Frequency Rate (MVIFR)						
Total # of Firm's Motor Vehicle Incidents x 1,000,000						
Total # Kilometers/Miles driven						
Environmental Incidents	2010	2009	2008			
Total # Spills to Water						
a. Petroleum Spills						
# spills Sheen (est. volume as 0.1 bbl. To < 1bbl.						
# spills 1 bbl. To < 100 bbls.						
# spills 100 bbls. or more						
b. Chemical Spills						
# spills 1 bbl./160 kg. to < 100 bbls./16,000 kg.						
# spills 100 bbls./16,000 or more						
<u>Total # Spills to Land</u> a. Petroleum spills						
# spills 1 bbl. To < 100 bbls.						
# spills 100 bbls. or more						
b. Chemical Spills						
# spills 1 bbl./160 kg. to < 50 bbls./8,000 kg						
# spills 50 bbls./8,000 kg. or more						
Enforcement Actions	2010	2009	2008			
Citations						
# Health and Safety						
# Environmental						
Please provide details						
Fines						
Total # Fines						
Total \$\$ Paid						
Please provide details						

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	HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT				
Hig	hest ranking HSE professional in the firm:				
Na	me/Title: Email:		Telephone Numbers		
Do	you have a written Basic Safety / HSE Program?	Yes 🗌	No 🗌		
Do	es your Basic Safety/HSE Program include the following?				
a. b. d. e. f. g.	HSE Policy statement signed by management Management Involvement and Commitment Hazard Identification and Risk Control Rules and Work Procedures Training Communications Incident and Accident Reporting and Investigation	Yes Yes Yes Yes Yes Yes Yes Yes	No    No    No    No    No    No		
	es the program include work practices and procedures ch as?				
a.	Permit to Work including Isolation of Energy	Yes 🗌	No 🗌		
b.	Confined Space Entry	Yes 🗌	No 🗌		
c.	Injury and Illness Recording	Yes 🗌	No 🗌		
d.	Fall Protection	Yes 🗌	No 🗌		
e.	Personal Protective Equipment	Yes 🗌	No 🗌		
f.	Portable Electrical/Power Tools	Yes 🗌	No 🗌		
g.	Motor Vehicle/Driving Safety	Yes 🗌	No 🗌		
h.	Compressed Gas Cylinders	Yes 🗌	No 🗌		
i.	Electrical Equipment Grounding Assurance	Yes 🗌	No 🗌		
j.	Powered Industrial Vehicles (Cranes, Forklifts, Etc.)	Yes 🗌	No 🗌		
k.	Housekeeping	Yes 🗌	No 🗌		
١.	Accident/Incident Reporting and Investigations	Yes 🗌	No 🗌		
m.	Unsafe Condition Reporting	Yes 🗌	No 🗌		
n.	Emergency Preparedness, Including Evacuation Plan	Yes 🗌	No 🗌		
о.	Waste Disposal and Pollution Prevention	Yes 🗌	No 🗌		
р.	Regular Workplace Inspection / Audits	Yes 🗌	No 🗌		
<b>Do</b> a. b. c.		Yes Yes Yes Yes Yes	No		

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HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT					
Do you have a Job Safety Analysis (JSA) process i	n place?	Yes		No	
Is there a Root Cause Analysis process used for investigations, near misses, environmental spills?		Yes		No	
Is there a Management of Change (MOC) Process in	n place?	Yes		No	
Do you have programs for the following?					
a. Respiratory Protection		Yes		No	
<ul> <li>b. Where applicable, have employees been:</li> <li>Trained</li> <li>Fit tested</li> <li>Medically approved</li> <li>c. Hazard communication/WHMIS</li> <li>d. Programs for potential high hazard work suc Hazardous Chemicals; Explosives and Blasting</li> </ul>	Agents	Yes Yes Yes Yes Yes		No No No No	
Do you have a corrective action process for addressing individual/employee safety and health performance deficiencies?				No	
Medical					
<ul> <li>a. Do you conduct medical examinations for:</li> <li>Pre-placement Job Capability</li> <li>Pulmonary</li> <li>Respiratory</li> <li>Describe how you intend to provide first aid and other medical services while on-site.</li> </ul>				No No No	
Do you have personnel trained to perform first aid	and CPR?	Yes		No	
Personal Protective Equipment (PPE)					
a. Is applicable PPE provided for employees?		Yes		No	
b. Do you have a program to assure that PPE is inspected and maintained?		Yes		No	
HSE Meetings				Freq	uency
<ul> <li>a. Do you hold site HSE meetings for?</li> <li>Field Supervisors</li> <li>Employees</li> <li>New Hires</li> <li>Subcontractors</li> </ul>	Yes Yes Yes Yes	No No No			

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	HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT					
Inspe	ections and Audits				Frequ	ency
a.	Do you conduct internal HSE Inspections?	Yes 🗌	No			
b.	Do you conduct internal HSE program audits?	Yes 🗌	No			
C.	Are corrections or deficiencies to internal HSE program or equipment communicated and documented until closure?	Yes 🗌	No			
Equip	oment and Materials:					
a.	Do you own or lease Equipment and Materia please complete the following questions:	•	Yes		No	
b.	Do you have a system for establishing applic safety, and environmental specifications for a materials and equipment?		Yes		No	
C.	Do you conduct inspections on operating equ cranes, forklifts) in compliance with requirements?	ipment (e.g., regulatory	Yes		No	
d.	Do you maintain operating equipment in corr regulatory requirements?	pliance with	Yes		No	
e.	Do you maintain the applicable inspection and certification records for operating equipment?		Yes		No	
f.			Yes		No	
Subc	ontractor Management					
a.	Do you subcontract any work? If the answer is complete the following questions:	s yes, please	Yes		No	$\boxtimes$
b.	Do you have a written contractor safety process?	management	Yes		No	
C.	Do you use HSE performance criteria in subcontractors?		Yes		No	
d.	Do you evaluate the ability of subcontractors to applicable HSE requirements as part of th process?		Yes		No	
e.	Do your subcontractors have a written HSE Prog	gram?	Yes		No	
f.	<ul> <li>Do you include your subcontractors in:</li> <li>HSE Orientation</li> <li>HSE Meetings</li> <li>HSE Equipment Inspections</li> <li>HSE Program Audits</li> <li>Are corrections or deficiencies documented</li> </ul>	I	Yes Yes Yes Yes Yes		No No No No	

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	HEALTH, SAFETY AND ENVIRONMENTAL MANAGEMENT						
Empl	oyee and Trades Training						
a.	Have employees been trained in appropriate job skills?		Yes		No		
b. c.	Are employees' job skills certified where required by regulatory or industry consensus standards? List trades/crafts which have been certified:		Yes		No		
0.							
Healt	h, Safety and Environmental Orientation		New H	lires	Super	visors	
a. b.	Do you have an HSE Orientation Program for new hires and newly hired or promoted supervisors? Does the program provide instruction on the	Yes		No 🗌	Yes 🗌	No 🗌	
	following: •New worker orientation •Safe Work Practices •Safety Supervision •Toolbox meetings •Emergency Procedures •First Aid Procedures •Fire Protection and Prevention •Safety Intervention •Hazard Communication/WHMIS	Yes Yes Yes Yes Yes Yes Yes Yes		No    No    No    No    No    No    No	Yes Yes Yes Yes Yes Yes Yes Yes	No    No    No    No    No    No    No	
Healt	h, Safety and Environmental Training						
a.	Do you know the regulatory HSE training requirement your employees?	ts for	Y	∕es 🗌	No		
b.	Have your employees received the required HSE tra and re-training	aining	Ŷ	′es 🗌	No		
C.	Do you have a specific HSE training program supervisors?	m for	Ŷ	′es □	No		
Train	ing Records						
a.	Employee's?	your	Y	′es 🗌	No		
b. c.	<ul> <li>Do the training records include the following:</li> <li>Employee identification</li> <li>Date of training</li> <li>Name of trainer</li> <li>Method used to verify understanding</li> <li>How do you verify understanding of training? (Check all</li> </ul>	l that ap	Y Y Y	∕es □ ∕es □ ∕es □ ∕es □	No No No		
D Wi	ritten test		Job Mo	onitoring	Other (Li	st)	

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## Purpose

The purpose of this training program is to protect employees from safety hazards that may be encountered during work in trenches and excavations.

#### Scope

Waco, Inc. is required to participate as a contract employer at client locations with trenching and excavation work; however Waco, Inc. does not initiate trenching operations.

When work is performed on a non-owned or operated site, the operator's program shall take precedence; however, this document covers Waco, Inc. employees for basic awareness purposes that addresses all items and shall be used when an operator's program doesn't exist.

#### Definitions

Accepted engineering practices means the standards of practice required by a registered professional engineer.

Aluminum Hydraulic Shoring means a manufactured shoring system consisting of aluminum hydraulic cylinders (crossbraces) used with vertical rails (uprights) or horizontal rails (wales).

Bell-bottom pier hole means a type of shaft or footing excavation, the bottom of which is made larger than the cross section above to form a belled shape.

Benching (Benching system) is a method of protecting employees from cave-ins by excavating the sides of an excavation to form one or more horizontal steps, usually with vertical or near-vertical surfaces between levels.

Cave-in means the movement of soil or rock into an excavation, or the loss of soil from under a trench shield or support system, in amounts large enough to trap, bury, or injure and immobilize a person.

Cross braces mean the horizontal members of a shoring system installed from side to side of the excavation. The cross braces bear against either uprights or Wales.

Excavation means any man-made cut, cavity, trench, or depression in an earth surface formed by earth removal.

Faces or sides mean the vertical or inclined earth surfaces formed as a result of excavation work.

Failure means the movement or damage of a structural member or connection that makes it unable to support loads.

Hazardous atmosphere means an atmosphere that is explosive, flammable, poisonous, corrosive, oxidizing, irritating, oxygen deficient, toxic, or otherwise harmful, which may cause death, illness, or injury.

Health Safety Officer means the individual at Waco, Inc. responsible for developing and implementing this program, conducting unannounced work site inspections, and ensuring that the departments comply with the program requirements.

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Kickout means the accidental movement or failure of a cross brace.

Protective system means a method of protecting employees from cave-ins, from material that could fall or roll from an excavation face into an excavation, or from the collapse of adjacent structures. Protective systems include support systems, sloping and benching systems, shield systems, and other systems that provide the necessary protection.

Ramp means an inclined walking or working surface that is used to gain access to one point from another. A ramp may be constructed from earth or from structural materials such as steel or wood.

Sheeting means the members of a shoring system that retain the earth in position and in turn are supported by other members of the shoring system.

Shield (Shield system) means a structure used in an excavation to withstand cave-ins and which will protect employees working within the shield system. Shields can be permanent structures or portable units moved along as work progresses. Shields used in trenches are usually referred to as "trench boxes" or "trench shields."

Shoring (Shoring system) means a structure that is built or put in place to support the sides of an excavation to prevent cave-ins.

Sides - See "Faces."

Sloping (Sloping system) means sloping the sides of the excavation away from the excavation to protect employees from cave-ins. The required slope will vary with soil type, weather, and surface or near surface loads that may affect the soil in the area of the trench (such as adjacent buildings, vehicles near the edge of the trench and so forth).

Stable rock means natural solid mineral material that can be excavated with vertical sides that will remain intact while exposed.

Structural ramp means a ramp built of steel or wood, usually used for vehicle access. Ramps made of soil or rock are not considered structural ramps.

Support system means a structure such as underpinning, bracing, or shoring, which provides support to an adjacent structure, underground installation, or the sides of an excavation.

Tabulated data means tables and charts approved by a registered professional engineer and used to design and construct a protective system.

Trench (Trench excavation) means a narrow excavation (in relation to its length) made below the surface of the ground.

Trench box or shield - See "Shield".

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Uprights mean the vertical members of a trench shoring system placed in contact with the earth and usually positioned so that individual members do not contact each other. Uprights placed so that individual members are closely spaced, in contact with or interconnected to each other, are often called "sheeting."

Wales are horizontal members of a shoring system placed in the direction of the excavation face whose sides bear against the vertical members of the shoring system or earth (the uprights or sheeting).

# **Key Responsibilities**

Management shall determine if this program is required for regulatory compliance within his/her region. If this program is deemed necessary, then management shall determine which employees within his/her region is required to receive this training. Management shall select a training facility or use an in-house qualified trainer to supply the training.

Only trained personnel can be involved in working in trenches or excavations. Waco, Inc. personnel DO NOT initiate trenching.

# Procedure

**Competent Person Duties** – The Safety Manager or their designee shall have the following duties:

### Protective Systems or Equipment

- Monitoring water removal equipment and operations.
- Removal of workers if conditions dictate.
- Atmospheric testing.
- Inspecting excavations subject to runoff from heavy rains to determine need for diversion ditches, dikes, or other suitable protection.
- Determining cave-in potential to assess need for shoring or other protective system.
- Examining damaged material or equipment used for protective systems to determine its suitability for continued use.
- Classifying soil and rock deposits, by both visual analysis and by testing, to determine appropriate protection; re-classifying, if necessary, based on changing conditions.
- Determining the appropriate slope of an excavation to prevent collapse due to surcharge loads from stored material or equipment, operating equipment, adjacent structures, or traffic, and assuring that such slope is achieved.

### Inspecting Trench and Protective Systems

• Inspections prior to entry and authorizing immediate removal of employees from the hazardous area where evidence of possible cave-in, failure of protective systems, hazardous atmospheres, or other hazardous conditions exists.

### Unsafe Access/Egress

• Designing structural ramps that are used solely by employees as a means of access or egress. Structural ramps used for access or egress of equipment must be designed by a competent person qualified in structural design.

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## Utilities and Pre-work Site Inspection

The location of underground installations shall be determined before excavation.

When utility companies or owners cannot respond to a request to locate underground utility installations within 24 hours, or cannot establish exact location of these installations, Waco, Inc. may proceed, provided it does so with caution and provided detection equipment or other acceptable means to locate utility installations are used.

Excavation shall be done in a manner that does not endanger the underground installations or the employees engaged in the work. Utilities left in place shall be protected by barricades, shoring, suspension or other means as necessary to protect employees.

### **Protection of the Public**

Barricades, walkways, lighting and posting shall be provided as necessary for the protection of the public prior to the start of excavation operations.

Guardrails, fences, or barricades shall be provided on excavations adjacent to walkways, driveways and other pedestrian or vehicle thoroughfares. Warning lights or other illumination shall be maintained as necessary for the safety of the public and employees from sunset to sunrise.

Wells, holes, pits, shafts and all similar hazardous excavations shall be effectively barricaded or covered and posted as necessary to prevent unauthorized access. All temporary excavations of this type shall be backfilled as soon as possible.

### **Protection Against Falls**

Walkways or crossings shall be protected by standard guardrails or railings shall be provided where employees and the general public are permitted to cross over excavations. Where workers in the excavation may pass under these walkways or bridges, a standard guardrail and toe board shall be used.

### **Protection of Workers in Excavations**

### Access and Means of Egress

Stairs, ladders or ramps shall be provided where employees are required to enter trench excavations over 4 feet deep. The maximum distance of lateral travel (e.g., along the length of the trench) required to reach the means of egress shall not exceed 25 feet.

### Structural Ramps

Structural ramps used solely by employees as a means of access or egress from excavations shall be designed by a competent person. Structural ramps used for access or egress of equipment shall be designed by a person qualified in structural design, and shall be constructed in accordance with the design.

Ramps and runways constructed of two or more structural members shall have the structural members connected together to prevent movement or displacement.

Structural members used for ramps and runways shall be of uniform thickness.

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Cleats or other appropriate means used to connect runway structural members shall be attached to the bottom of the runway or shall be attached in a manner to prevent tripping.

Structural ramps used in place of steps shall be provided with cleats or other surface treatments on the top surface to prevent slipping.

### Ladders

When portable ladders are used, the ladder side rails shall extend a minimum of 3 feet above the upper surface of the excavation.

Ladders shall have nonconductive side rails if work will be performed near exposed energized equipment or systems.

Two or more ladders, or a double-cleated ladder, will be provided where 25 or more employees will be conducting work in an excavation where ladders serve as the primary means of egress, or where ladders serve two-way traffic.

Ladders will be inspected prior to use for signs of damage or defects. Damaged ladders will be removed from service and marked with "Do Not Use" until repaired.

Ladders shall be used only on stable and level surfaces unless secured. Ladders placed in any location where they can be displaced by workplace activities or traffic shall be secured, or barricades shall be used to keep these activities away from the ladder.

Non-self-supporting ladders shall be positioned so that the foot of the ladder is one-quarter of the working length away from the support.

Employees shall not be allowed to carry any object or load while on the ladder that could cause them to lose their balance and fall.

### Exposure to Vehicular Traffic

Employees exposed to vehicular traffic shall be provided with, and shall wear vests or other suitable garments marked with or made of reflectorized or high-visibility material. Warning vests worn by flagmen shall be red or orange, and shall be of reflectorized material if worn during night work.

### Employee Exposure to Falling Loads

No employee shall be permitted underneath loads (or where loads may fall) handled by lifting or digging equipment. Employees shall be required to stand away from any vehicle being loaded or unloaded to avoid being struck by any spillage or falling materials. Operators may remain in the cabs of vehicles being loaded or unloaded when the vehicles provide adequate protection for the operator during loading and unloading operations.

### Warning System for Mobile Equipment

A warning system shall be used when mobile equipment is operated adjacent to the edge of an excavation if the operator does not have a clear and direct view of the edge of the excavation. The warning system shall consist of barricades, hand or mechanical signals, or stop logs. If possible, the grade should be away from the excavation.

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### Hazardous Atmospheres

The atmosphere shall be tested for air contaminants (oxygen, flammable gases, etc.) in excavations over 4 feet deep or if a hazardous atmosphere exists or could reasonably be expected to exist. A hazardous atmosphere could be expected, for example, in excavations in landfill areas, in excavations in areas where hazardous substances are stored nearby, or in excavations near or containing gas pipelines.

Adequate precautions shall be taken to prevent employee exposure to atmospheres containing less than 19.5 percent oxygen and other hazardous atmospheres. These precautions include providing proper respiratory protection or forced ventilation of the workspace.

Forced ventilation will be provided where necessary to ensure the atmosphere is safe.

When controls are used that are intended to reduce the level of atmospheric contaminants to acceptable levels, continuous air monitoring will be performed. The device used for atmospheric monitoring shall be equipped with an audible and visual alarm.

Atmospheric testing will be performed using a properly calibrated direct reading gas monitor. Direct reading gas detector tubes or other acceptable means may also be used to test potentially toxic atmospheres.

### Personal Protective Equipment

All employees working in trenches or excavations shall wear approved hard-hats and steel toed shoes or boots.

Employees exposed to flying fragments, dust, or other materials produced by drilling, sawing, sanding, grinding and similar operations shall wear approved safety glasses with side shields.

Employees exposed to hazards produced by, or performing, welding, cutting, or brazing operations shall wear approved spectacles or a welding faceshield or helmet.

Employees entering bell-bottom pier holes or other similar deep and confined footing excavations shall wear a harness with a lifeline securely attached to it. The lifeline shall be separate from any line used to handle materials and shall be individually attended at all times while the employee wearing the lifeline is in the excavation.

Employees shall wear approved gloves or other suitable hand protection.

Employees using, or working in the immediate vicinity of, hammer drills, masonry saws, jackhammers or similar high noise producing equipment shall wear suitable hearing protection.

Each employee at the edge of an excavation 6 feet or more deep shall be protected from falling. Fall protection shall be provided by guardrail systems, fences or barricades.

Emergency rescue equipment, such as breathing apparatus, a safety harness and line, and a basket stretcher shall be readily available where hazardous atmospheric conditions exist or may develop during work in an excavation. This equipment shall be attended when in use. Only personnel that have received approved training and have appropriate equipment shall attempt retrieval that would require entry into a hazardous atmosphere.

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## Protection from Hazards Associated with Water Accumulation

Employees shall not work in excavations that contain or are accumulating water unless precautions have been taken to protect employees against the hazards posed by water accumulation. The precautions taken must include inspection by a competent person before work begins, special support or shield systems to protect from cave-ins, water removal to control the level of accumulating water or use of safety harnesses and lifelines.

If water is controlled or prevented from accumulating by the use of water removal equipment, the water removal equipment and operation shall be monitored by a competent person trained in the use of the equipment.

If excavation work interrupts the natural drainage of surface water (such as streams), diversion ditches, dikes, or other suitable means shall be used to prevent surface water from entering the excavation. Precautions shall also be taken to provide adequate drainage of the area adjacent to the excavation.

The competent person shall inform workers of the precautions or procedures that are to be followed if water accumulates or is accumulating in an excavation.

### Stability of Adjacent Structures

The competent person will determine if the excavation work could affect the stability of adjoining buildings, walls, sidewalks or other structures.

Support systems (such as shoring, bracing, or underpinning) shall be used to assure the stability of structures and the protection of employees where excavation operations could affect the stability of adjoining buildings, walls, or other structures.

Excavation below the level of the base or footing of any foundation or retaining wall that could be reasonably expected to pose a hazard to employees shall not be permitted.

### Protection of Employees from Falling Objects and Loose Rocks or Soil

Adequate protection shall be provided to protect employees from loose rock or soil that could pose a hazard by falling or rolling from an excavation face. Such protection shall consist of:

- Scaling to remove loose material;
- Installation of protective barricades, such as wire mesh or timber, at appropriate intervals on the face of the slope to stop and contain falling material; or
- Benching sufficient to contain falling material.

Excavation personnel shall not be permitted to work above one another where the danger of falling rock or earth exists.

Employees shall be protected from excavated materials, equipment or other materials that could pose a hazard by falling or rolling into excavations.

Protection shall be provided by keeping such materials or equipment at least 2 feet from the edge of excavations, by the use of restraining devices that are sufficient to prevent materials or equipment from falling or rolling into excavations, or by a combination of both if necessary.

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Materials and equipment may, as determined by the competent person, need to be stored further than 2 feet from the edge of the excavation if a hazardous loading condition is created on the face of the excavation.

Materials piled, grouped or stacked near the edge of an excavation must be stable and self-supporting.

Using the following categories, soil is classified into different types, which determine the kind of cave-in protection required. Only a competent and trained person can determine the soil type by using these classifications.

- Grain sizes are usually classified into four types: gravel, sand, silt, clay. Gravel is the least stable, and clay is the most stable.
- Saturation is the amount of water that the soil is currently holding. Complete saturation is much less stable than soil that is only slightly damp. However, soil with no water content is unstable.
- Cohesiveness is a test that determines how well the soil sticks together. The more it sticks together, the more stable the trench walls will be. The field test usually consists of rolling the soil in your hand into the shape of a worm and observing how and when it separates.
- Unconfined compressive strength determines how much weight per square foot the soil can withstand. This will determine how easily the soil will shear and cave in

## Soil Types

Soil classifications must be determined by testing and protective systems designed according to soil classifications.

- The most stable type of soil is Type A. It is dense and heavy and consists primarily of clay.
- Type B has a medium level of stability and is made of soils such as silt, sandy loam, and medium clay.
- The least stable soil is Type C, which consists of gravel, loamy sand, and soft clay.

Timber shoring or aluminum hydraulic shoring must be determined according to the appendixes A & C of 29 CFR 1926 (Excavations).

The devices should be used while in good repair and maintenance. If damaged they must be inspected.

Employees should be protected from hazards of falling, rolling or sliding materials or equipment. Shields should not be subjected to excessive forces and will be installed to protect employees from lateral loads. Employees are restricted from being in the shield when installing or removing. The shield must be designed to resist calculated trench forces.

### **Daily Inspection**

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

Where the competent person finds evidence of a situation that could result in a possible cave-in, failure of protective systems, hazardous atmosphere, or other hazardous conditions, exposed employees shall be immediately removed from the hazardous area until precautions have been taken to assure their safety.

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There shall be a written log of all inspections conducted. This log shall include the date, work site location, results of the inspection, and a summary of any action taken to correct existing hazards.

# Training

All personnel involved in trenching or excavation work shall be trained in the requirements of this program and regulatory requirements.

Training shall be performed before the employee is assigned duties in excavations.

Retraining will be performed whenever work site inspections conducted by the competent person or Health Safety Officer indicate that an employee does not have the necessary knowledge or skills to safely work in or around excavations.

Training records shall include the date(s) of the training program, the instructor(s) of the training program, a copy of the written material presented, and the names of the employee(s) to whom the training was given.

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WELDING, CUTTING AND HOT WORK			Next Review Date:	02/01/2025
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## Purpose

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

#### Scope

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

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

#### Definitions

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

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

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

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

#### Key Responsibilities

#### Managers and Supervisors

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

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

### Employees

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

### Procedure

### General

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

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

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

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

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

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

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

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

- In areas not authorized by management.
- In sprinkled buildings while such protection is impaired.
- In the presence of potentially explosive atmospheres, e.g. flammables.
- In areas near the storage of large quantities of exposed, readily ignitable materials.

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- In areas where there is dust accumulation of greater than 1/16 inch within 35 feet of the area where welding/hot work will be conducted.
- All dust accumulation shall be cleaned up before welding or hot work is permitted.

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

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

### **Fire Prevention Measures**

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

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

Requirements for welding conducted outside the designated welding area:

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

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

### Confined Space

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

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

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Ventilation is a prerequisite to work in confined spaces.

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

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

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

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

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

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

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

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

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

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

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### Fumes, Gases and Dust

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

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

Welders and helpers will refer to Waco, Inc.'s Respiratory Protection Program to determine the appropriate respiratory protection to be used during welding operations.

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

### **Personal Protection**

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

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

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

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

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

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

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

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

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Welding Op	Shade Number	
Shielded metal — arc welding 1/16, 3/32, 1/8-5/32 inch electrodes		10
Gas-shielded arc welding (nonferrous	Gas-shielded arc welding (nonferrous) 1/16, 3/32, 5/32 inch electrodes	
Gas-shielded arc welding (ferrous) 1	12	
7/32.1/4 inch electrodes		12
Shielded metal arc welding: 3/16 5/16, 3/8-inch electrodes		14
Atomic hydrogen welding		10 - 14
Carbon arc welding		14
Soldering		2
Torch brazing		3 or 4
Light cutting, h	p to 1 inch	3 or 4
Medium cutting, 1 i	inch to 6 inches	4 or 5
Healy cutting, 6 in	Healy cutting, 6 inches or over	
Gas welding (light) up to 1/8 inch		4 or 5
Gas welding (mediur	5 or 6	
Gas welding (heavy)	1/2 inch or over	6 or 8

### NOTE:

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

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

# **Cleaning Compounds**

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

- Degreasing and other cleaning operations involving chlorinated hydrocarbons shall be so located that no vapors from these operations will reach or be drawn into the atmosphere surrounding any welding operation.
- In addition, trichloroethylene and perchloroethylene shall be kept out of atmospheres penetrated by the ultraviolet radiation of gas-shielded welding operations.

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

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# Cylinders

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

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

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

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

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

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

All acetylene cylinders shall be stored valve-end up.

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

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

Special care must be taken when transporting gas cylinders:

- Cylinders must be secured with valve cap installed.
- Cylinders shall not be lifted by the valve protection caps, the regulators must be removed and cylinders shall not be dropped or permitted to strike each other.
- Removed regulators must be carried in the cab of the vehicle.
- Cylinders shall not be tampered with nor should any attempt be made to repair them.
- They shall be handled carefully rough handling, knocks, or falls are liable to damage the cylinder, valve or safety device and cause leakage.

Safety devices shall not be tampered with.

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# Arc Welding and Cutting

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

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

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

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

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

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

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

# **Resistance Welding**

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

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

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

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## **Transmission Pipeline**

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

Pressure testing:

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

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

### **Oxygen Fuel Gas Welding and Cutting:**

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

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

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

### Fire Watch Requirements

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

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

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

### First Aid Equipment

First aid equipment shall be available at all times. All injuries shall be reported as soon as possible for medical attention. First aid shall be rendered until medical attention can be provided.

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# Training

Training shall include:

- Position Responsibilities
- Cutters, welders and their supervisors must be suitably trained in the safe operations of their equipment and the safe use of the process.
- Fire Watch Responsibilities specifically, the fire watch must know:
  - That their ONLY duty is Fire Watch.
  - o When they can terminate the watch.
  - How to use the provided fire extinguisher(s).
  - o Be familiar with facilities and how to activate fire alarm, if fire is beyond the incipient stage.
  - o Operator Responsibilities
  - o Contractor Responsibilities
  - o Documentation requirements
  - o Respirator Usage requirements
  - Fire Extinguisher training.

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Worker Experience Initiative			Next Review Date:	02/01/2025
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### Purpose

The WACO, INC. Worker Experience Initiative is an education and process used to improve safety and reduce risk in the workplace. This process uses a proactive approach and is intended to educate employees about safe work practices. It will also assist in reducing at risk behaviors which in turn reduces injuries in our workplaces.

### Scope

The WACO, INC. Worker Experience Initiative requires that all new employees without prior Waco experience, will be paired up with another Waco journeyman employee who has a minimum employment with Waco of at least one year. The new employee will be required to work with experienced employee for a minimum of 30 days, or 160 hours, whichever comes first. This Initiative will be implemented in every location where Waco's customer requests or requires.

### Process

Waco's journeymen employees will be expected to mentor new employees about safe work practices within their particular trade.

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# Purpose

WACO, INC. will provide a safe work environment for its employees. In doing so, WACO, INC. will take all reasonable and practical measures to eliminate or minimize injury or incident risks associated with the nature of the work performed when employees work alone.

WACO, INC. shall establish site specific procedures for employees working alone.

# Objectives

To minimize risk to employees who may work alone and assistance is not readily available WACO, INC. will:

- Conduct written hazard assessments to identify existing or potential working alone hazards.
- Take measures to eliminate or control the hazards of working alone at WACO, INC. worksites.
- Ensure that affected employees are informed of the hazards and methods used to control or eliminate them.
- Provide an effective system for communication between any employee who work alone and persons capable of assisting the employee.
- Ensure all incidents (working related or otherwise) are reported, investigated and documented.
- Review the Working Alone Plan at least annually or more frequently if there is a change in work arrangements which could adversely affect an employee's well-being or a report that the system is not working effectively.

# **Key Responsibilities**

### WACO, INC. Safety Manager

- Conducts a hazard assessment to identify existing or potential hazards related to the nature of the work or the work environment given the circumstances of the work when working alone
- Responsible for the review, implementation, and maintenance of the local worksite Working Alone Plan.
- Communicate this policy and its procedures to employees who work alone
- Annually review the effectiveness of the hazard controls and procedures and make improvements as required

### Worksite Project Manager

- Responsible for the implementation and maintenance of the Working Alone Plan for their project and ensuring all assets are made available for compliance with the procedure.
- Take all reasonable and practical steps to minimize or eliminate identified working alone risks.
- Review the hazard assessment results and provide recommendations to management to minimize or eliminate identified working alone risks.
- Review annually the effectiveness of the policy and guidelines and make changes as required by consulting with management staff and employee representatives.
- Respond to employee concerns related to working alone and communicate these to management.
- Report all incidents of work site incidents immediately.
- Participate in work site hazard assessments and the implementing of procedures to eliminate or control hazards of working alone.

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## Safe Work Procedures

This procedure applies if an employee is working alone at a work site where assistance is not readily available if there is an emergency or the employee is ill or injured.

### Worksite Assessment

A hazard assessment for working alone will anticipate work and travel time, weather, communication, type of work, employee medical conditions and training. The hazard assessment shall address hazards and identify control measures in order to minimize risk associated with working alone.

The hazard assessment will be conducted on a project by project or site basis as circumstances vary between locations and conditions. To assess this hazard WACO, INC. should review records, past incidents and identify measures or actions needed to correct any hazards. The assessment should involve:

- Participation by employees through methods such as one-on-one interviews, kick off safety meetings, etc.
- The assessment should utilize information from employees about their experiences working alone, their current concerns and their suggestions for improvement.
- Consideration for the time interval between checks and the procedure to follow in case the employee cannot be contacted, including provisions for emergency rescue.

### Plan

WACO, INC. must develop and implement a written procedure for checking the well-being of a worker assigned to work alone or in isolation under conditions which present a risk of disabling injury, if the worker might not be able to secure assistance in the event of injury or other misfortune.

# Communication and Regular Contact Person System

Workers must carry a cellular phone or electronic monitoring device at all times while working alone. The use of a radio, cellular/satellite phone, electronic monitoring device or another form of direct, reliable correspondence shall be used to establish an effective means of communication is established between the lone employee and designated check person.

Each site-specific Working Alone Plan shall address a check-in/check-out process where employees are monitored or contacted at regular intervals. Individuals must be monitored at regular intervals, or the individual contacts WACO, INC. at pre-determined intervals based on determinations made in the risk assessment.

Individual(s) by job function responsible for establishing contact with the affected employee, as well as a back-up form of communication will be established for each site-specific plan. The Safety Manager, Project Manager or designee is responsible for check-in with the lone employee at regular intervals.

A backup form of communication in the event primary communication (cell phone or land line) is unavailable will be via satellite phone or if electronic communication is not practicable or readily available at the worksite, WACO, INC. must ensure that a representative of WACO, INC. or another competent employee visits the employee at regular intervals. WACO, INC. shall document communication employee status at the check in intervals.

These visits or contacts shall be at intervals of time appropriate to the nature of the hazards associated with the employee's work.

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## Procedures to be Followed in the Event That a Worker Working Alone Does Not Respond

Considerations such as length of time missing, weather conditions, physical fitness, etc. must be factored into the site-specific working alone program. The program must specify procedures for emergency response including provisions for contacting appropriate local officials. The program shall identify specific criteria to determine when an employee search is necessary. The minimum requirements include:

- If the working alone employee fails to respond at the scheduled contact time repeated contact efforts will be made for 1 hour.
- If the employee working alone is not contacted with 1 hour of the scheduled contact a designated individual will be dispatched for a search to the working location if within close proximity. If the working alone employee is not found, then the closest police (city) or governmental search and rescue authority shall be notified to conduct a search
- If the employee working alone is not within close proximity and does not respond to repeated contact efforts, then the closest police (city) or governmental search and rescue authority shall be notified to conduct a search.

### Limitations on or Prohibitions of Specified Activities

- No heavy equipment will be operated if a worker is alone.
- No hot work will occur if a worker is alone.
- No working at heights will occur if a work is alone and requiring a personal fall arrest system.
- Other limitations will be placed based on the site-specific hazard assessment

### Minimum Training or Experience

All employees will be trained (if working alone is a hazard at that location) in:

- Any revision to the written local Working Alone Plan and safe work practices.
- Being informed of working alone hazards at the WACO, INC. worksite and the methods used to control or eliminate them.
- The methods for identification, hazard reduction and prevention when working alone and dealing with situations or individuals that presents a potential risk.
- A worker required to work alone and any person assigned to check on the worker must be trained in the written procedure for checking the worker's well-being.
- All training shall be documented.

### Provisions of PPE

- Cold weather clothing shall be worn when appropriate if a worker is alone
- Additional PPE for workers working alone will be identified in the site-specific hazard and PPE assessment process

### Safe Work Practices

Controls implemented at WACO, INC. worksites shall, as a minimum:

- Restricted building access to buildings card keys or regular keys after regular working hours.
- Office doors are to be locked when working alone after hours.
- Have employees check road reports and weather forecast before traveling and NOT allow travel if road conditions are dangerous.
- Develop a travel plan that includes rest breaks, a procedure for tracking overdue employees and emergency contact information.
- Ensure all WACO, INC. vehicles are to be equipped with cell phones or radios and first aid kits.

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- Advise employees to travel with another employee when possible.
- Advise employees to park close to the building in the evening.
- Post signage, emergency contact information, and develop a communication system.
- Report suspicious activity to security or a supervisor.

# Provision of Emergency Supplies

- All vehicles shall contain the appropriate emergency supplies including flares, marking devices, food, water, warm clothing during winter and other supplies as determined by the hazard assessment.
- Workers working alone shall have spare batteries for communication devices in case of power failure, a radio for local weather conditions and other equipment as determined by the hazard assessment.
- If an employee requires personal medication, they must ensure they have sufficient supplies available.

# **Review & Updating Working Alone Plan**

- The hazard assessment and Working Alone Plan at each WACO, INC. worksite must be reviewed at least on an annual basis or more frequently if there is a change in work processes or arrangements which could adversely affect an employee's well-being are introduced or changed.
- The local Working Alone Plan shall also be revised if there is any indication or report that the plan is not working effectively or needs changing.

	WACO, INC. Safety Management System		Doc No:	ALONE
(Imp)			Initial Issue Date	02/01/2024
Inc			Revision Date:	02/01/2021
WORKING ALONE	Revision No.	2		
	Next Review Date:	02/01/2025		
Preparation: Safety Mgr	Authority: President	Issuing Dept: Safety	Page:	Page 5 of 5

# WORKING ALONE ASSESSMENT & GUIDELINES FOR WACO, INC. WORKSITES

Location:	
Evaluated By:	
Original Date:	Signature:
Revision Date:	Date:

# **Hazardous Activities**

Hazard:	Actions to minimize Risk:	
Indicate working alone hazards	Indicate actions taken to minimize risks	

# **Emergency Phone Numbers**

Number	Contact:	For:
Indicate #	Indicate source information; i.e., security	ANY emergency: medical, fire, etc.
		Suspicious Person
		General Inquiries
		Need for employee escort
		Maintenance Emergencies
		Information

# **Location of Resources**

Indicate location	(examples shown)	
	fire extinguisher	
	first aid kit	
	telephone	
	telephone backup (radios or emergency buttons for worksite security)	

# **Restricted activities when Working Alone**

Indicate restricted activities (no driving, locked doors, etc.)

A copy of this form shall be supplied to the WACO, INC. Safety Manager and the Guidelines be reviewed no less than annually.