



BROOKSTONE

CONSTRUCTION MANAGERS | GENERAL CONTRACTORS



SAFETY PROGRAM

SAFETY. SOLUTIONS.
Infinite Possibilities

July 2010

BUILDING. SOLUTIONS.

Infinite possibilities



TABLE OF CONTENTS

STATEMENT OF POLICY.....	TAB 1
PROJECT SAFETY.....	TAB 2
<i>Posting Requirements.....</i>	<i>Page 1</i>
<i>Safety Inspections.....</i>	<i>Page 1</i>
<i>Safety Incident Report Card.....</i>	<i>Page 2</i>
<i>Jobsite Safety Orientation.....</i>	<i>Page 2</i>
<i>General Requirements.....</i>	<i>Page 3</i>
<i>Excavation and Trenching.....</i>	<i>Page 4</i>
<i>Scaffolding.....</i>	<i>Page 5</i>
<i>Ladders and Stairways.....</i>	<i>Page 6</i>
<i>Personal Protective Equipment.....</i>	<i>Page 6</i>
<i>Electrical Safety.....</i>	<i>Page 6</i>
<i>Aerial Lifts.....</i>	<i>Page 7</i>
<i>Compressed Gas Cylinders.....</i>	<i>Page 7</i>
<i>Housekeeping.....</i>	<i>Page 8</i>
<i>Lasers.....</i>	<i>Page 8</i>
<i>Tools.....</i>	<i>Page 9</i>
<i>Crane and Other Heavy Equipment.....</i>	<i>Page 9</i>
CRISIS RESPONSE PROCEDURES.....	TAB 3
<i>First Hour Checklist for Senior Person On-Site.....</i>	<i>Page 1</i>
<i>Who to Contact.....</i>	<i>Page 1</i>
<i>What to Say if the Media Calls.....</i>	<i>Page 2</i>
<i>What is a Crisis?.....</i>	<i>Page 2</i>
<i>Why do you need to be ready for one?.....</i>	<i>Page 2</i>
<i>Do's and Don'ts of working with the News Media.....</i>	<i>Page 2</i>
<i>Getting Ready for the Interview.....</i>	<i>Page 4</i>
<i>Buy Time Statement.....</i>	<i>Page 4</i>
<i>Detailed Statement.....</i>	<i>Page 4</i>
<i>Injury Statement.....</i>	<i>Page 5</i>
<i>Fatality Statement.....</i>	<i>Page 5</i>
<i>Get Ready For Questions.....</i>	<i>Page 5</i>
<i>What Caused this Accident?.....</i>	<i>Page 5</i>
<i>How Many, and Who, were Injured/Killed?.....</i>	<i>Page 5</i>
<i>What is the Estimated Damage in Dollars?.....</i>	<i>Page 5</i>
<i>Have you had any Accidents in the Past?.....</i>	<i>Page 5</i>
<i>What's your Safety Record?.....</i>	<i>Page 5</i>
<i>Will you Step up your Safety Measures as a Result of this Accident?.....</i>	<i>Page 6</i>
<i>Can we come on site to take pictures?.....</i>	<i>Page 6</i>

I understand that this project is behind schedule. Do you think this accident was caused by pushing your workers too hard to make-up for lost time?..... Page 6

INCIDENT REPORTING AND RECORD KEEPING REQUIREMENTS..... TAB 4

- Reporting Procedures..... Page 1*
- Incident Investigation Procedures..... Page 1*
- Accident Investigation Procedures..... Page 2*
- Recording and Record Keeping..... Page 3*
 - Incident Report..... Page 3*
 - First-Aid Log..... Page 3*
 - Employee’s First Report of Injury..... Page 4*
 - OSHA Record-Keeping Procedures..... Page 4*

NEW EMPLOYEE SAFETY ORIENTATION..... TAB 5

HEALTH HAZARDS & ENVIRONMENTAL CONTROLS TAB 6

- Maintenance of Safety Installations..... Page 1*
- Housekeeping..... Page 1*
- Work in Occupied Structures..... Page 3*
- Environmental Controls for Occupied Structures..... Page 3*
- Closures and Barricades..... Page 4*

FALL PROTECTION..... TAB 7

- Guard Rail Installations and Maintenance..... Page 1*
- Guarding Requirements..... Page 1*

EXCAVATION AND TRENCHING..... TAB 8

- Protection from Live Systems..... Page 2*

FIRE PREVENTION AND PROTECTION..... TAB 9

- Key Definitions..... Page 1*
 - Competent Person..... Page 1*
 - Safety Trained..... Page 1*
 - Fire Watch..... Page 1*
- Training..... Page 2*
- Inspection and Storage..... Page 3*
- Safety Cans..... Page 4*
- Fire Prevention Procedures..... Page 5*
- In the Event of a Fire..... Page 7*
- Ignition Hazards..... Page 7*
- Classes of Fires..... Page 8*
- Extinguisher Types..... Page 9*
- Flammable Liquids (Flash Point 100°F or Less)..... Page 9*

<i>Safe Handling of Flammable & Combustible Materials.....</i>	<i>Page 10</i>
<i>Proper Use of Fire Fighting Equipment.....</i>	<i>Page 10</i>
<i>Cutting and Welding “Hot Work” Protocol.....</i>	<i>Page 11</i>
STEEL ERECTION.....	TAB 10
CONFINED SPACE ENTRY.....	TAB 11
<i>Key Definitions.....</i>	<i>Page 1</i>
<i>Competent Person.....</i>	<i>Page 1</i>
<i>Attendant.....</i>	<i>Page 1</i>
<i>Entrant.....</i>	<i>Page 1</i>
<i>Entry Supervisor.....</i>	<i>Page 1</i>
<i>Stand-by Attendant.....</i>	<i>Page 1</i>
<i>Stand-by Entrant.....</i>	<i>Page 1</i>
<i>Confined Space Entry Policy.....</i>	<i>Page 1</i>
<i>Training (General).....</i>	<i>Page 2</i>
<i>Training (Specific).....</i>	<i>Page 2</i>
<i>Definitions.....</i>	<i>Page 3</i>
<i>Permit Required Confined Space Entry Procedures.....</i>	<i>Page 4</i>
<i>General Procedures.....</i>	<i>Page 4</i>
<i>Isolation Requirements.....</i>	<i>Page 5</i>
<i>Confined Space Atmospheric Requirements.....</i>	<i>Page 5</i>
<i>Burning and Welding.....</i>	<i>Page 6</i>
<i>Emergency Alarms.....</i>	<i>Page 7</i>
<i>Atmosphere Testing.....</i>	<i>Page 7</i>
<i>Ventilation.....</i>	<i>Page 8</i>
<i>Confined Space Rescue.....</i>	<i>Page 8</i>
PERSONAL PROTECTIVE EQUIPMENT (PPE)	TAB 12
<i>Policy Statement.....</i>	<i>Page 1</i>
<i>Employee Classification.....</i>	<i>Page 1</i>
<i>Personal Protective Equipment Policy.....</i>	<i>Page 1</i>
<i>Training.....</i>	<i>Page 2</i>
<i>Inspection and Storage.....</i>	<i>Page 2</i>
<i>Head Protection.....</i>	<i>Page 3</i>
<i>Hearing Protection.....</i>	<i>Page 3</i>
<i>Foot Protection.....</i>	<i>Page 4</i>
<i>Hand Protection.....</i>	<i>Page 5</i>
<i>Respiratory Protection.....</i>	<i>Page 6</i>
<i>Fall Protection.....</i>	<i>Page 7</i>
<i>Practical Examples in Fall Protection.....</i>	<i>Page 7</i>
EYE AND FACE PROTECTION.....	TAB 13
<i>Eye and Face Protection Selection Guide.....</i>	<i>Page 2</i>

ILLEGAL DRUGS, ALCOHOLIC BEVERAGES, FIREARMS AND WEAPONS.....	TAB 14
<i>Pre-Employment Drug Testing.....</i>	<i>Page 1</i>
<i>Random Drug Testing.....</i>	<i>Page 1</i>
<i>Post-Accident Drug Testing.....</i>	<i>Page 2</i>
<i>Other Conditions Which Could Trigger a Drug Test/Search.....</i>	<i>Page 2</i>
<i>Consequences of Violating this Drug, Alcoholic, and Firearms Policy.....</i>	<i>Page 2</i>
<i>Treatment Programs and Employee Insurance.....</i>	<i>Page 3</i>
<i>Education and Training Programs.....</i>	<i>Page 3</i>
REGULATORY INSPECTIONS.....	TAB 15
<i>General.....</i>	<i>Page 1</i>
<i>Inspection Procedure.....</i>	<i>Page 1</i>
<i>Types of Inspection.....</i>	<i>Page 5</i>
<i>General Considerations.....</i>	<i>Page 5</i>
<i>Safe Work.....</i>	<i>Page 6</i>
<i>Professional Attitude.....</i>	<i>Page 6</i>
<i>Required Posting and Records.....</i>	<i>Page 6</i>
<i>Jobsite Appearance.....</i>	<i>Page 6</i>
<i>Documentation.....</i>	<i>Page 6</i>
<i>Answering Question.....</i>	<i>Page 6</i>
<i>Good Will.....</i>	<i>Page 6</i>
EQUIPMENT MAINTENANCE.....	TAB 16
<i>General.....</i>	<i>Page 1</i>
<i>Heavy Equipment.....</i>	<i>Page 1</i>
<i>Inspection of Equipment.....</i>	<i>Page 1</i>
<i>Operator Training.....</i>	<i>Page 2</i>
SAFETY ENFORCEMENT POLICY.....	TAB 17
<i>Serious Misconduct.....</i>	<i>Page 1</i>
<i>Very Serious Misconduct.....</i>	<i>Page 1</i>
<i>Inexcusable Misconduct.....</i>	<i>Page 1</i>
HAZARD COMMUNICATIONS AND EMPLOYEE RIGHT-TO-KNOW.....	TAB 18
<i>Overview of the Regulations.....</i>	<i>Page 2</i>
<i>Chemical Inventory List.....</i>	<i>Page 3</i>
<i>Material Safety Data Sheets.....</i>	<i>Page 4</i>
<i>Written Hazard Communication Program Requirements.....</i>	<i>Page 5</i>
<i>Important Program Elements.....</i>	<i>Page 6</i>
<i>Chemical Labeling.....</i>	<i>Page 6</i>
<i>Medical and Exposure Monitoring.....</i>	<i>Page 6</i>
<i>Disposal.....</i>	<i>Page 6</i>
<i>Program Review and Records.....</i>	<i>Page 6</i>
<i>Hazard Communication Written Program.....</i>	<i>Page 8</i>

<i>Chemical Inventory</i>	Page 8
<i>Container Labeling</i>	Page 8
<i>Material Safety Data Sheets (MSDS)</i>	Page 9
<i>Employee Training</i>	Page 9
<i>Emergency Response</i>	Page 9
<i>Hazards of Non-Routine Tasks</i>	Page 9
<i>Informing Other Employers</i>	Page 10
<i>Posting</i>	Page 10
<i>Making the Chemical Inventory</i>	Page 11
<i>Chemical Inventory List Form</i>	Page 13
Employee Training	Page 14
<i>Planning the Training Activities</i>	Page 16
<i>At a minimum, the Hazard Communication Training Program Needs to Inform Employees</i>	Page 16
<i>Specific Hazardous Chemical Training Needs to Address</i>	Page 16
<i>Training May be Done Using Any of the Following</i>	Page 17
<i>Monitoring Training Results</i>	Page 18
<i>What Employees Should Remember After Training</i>	Page 18
<i>Using Material Safety Data Sheets (MSDS)</i>	Page 19
<i>Training Session on Hazard Communication Form</i>	Page 20
INCIDENT INVESTIGATION REPORT FORM	TAB 19
FIRST-AID LOG	TAB 20
BROOKSTONE SAFETY ORIENTATION	TAB 21
DAILY HAZARD ASSESSMENT FORM	TAB 22
WEEKLY SAFETY INSPECTION REPORT	TAB 23

STATEMENT OF POLICY

Brookstone, L.P. is committed to providing a safe jobsite for the general public, our employees and employees of subcontractors, clients and suppliers.

Safety on all Brookstone, L.P. projects is not just a corporate goal, it is a requirement.

Brookstone's safety goals are:

Achieve Zero Recordable Incidents for Brookstone, L.P. employees and projects.

Achieve Zero Lost Time accidents for all Brookstone, L.P. employees and projects.

Achieve Zero O.S.H.A. citations for all Brookstone, L.P. projects.

Chris Roberts is Brookstone's Safety Director and is responsible for the implementation and maintenance of Brookstone's safety process.

It is a condition of employment with Brookstone, L.P.; all employees will adhere to the requirements of this policy, as well as the safety rules, instructions, and procedures. Failure to do so will result in disciplinary action.

It is a condition of all subcontracts and purchase orders issued by Brookstone, L.P. that this policy and the safety rules, instructions and procedures issued in conjunction with it, as well as all applicable state, federal and local codes and regulations be adhered to. Failure to comply is a breach of contract terms.

All visitors to any Brookstone, L.P. project, including but not limited to suppliers, owner representatives, representatives of the architect or engineer, regulatory authorities and insurance company representatives, shall be required to follow all safety rules and regulations in effect during their visit.

Brookstone, L.P. will make an effort to ensure the operations of other contractors not under our control do not endanger the safety of others. To this end, all personnel are required to report hazardous activities or conditions to Brookstone, L.P. Management.

Steve Dishman
President

PROJECT SAFETY

Workplace safety is everyone's responsibility. Project safety begins with the Project Superintendent. It is each superintendent's responsibility to insure that project personnel are familiar with their responsibilities as outlined in this manual. In addition to all Occupational Health and Safety (OSHA) standard requirements, the following guidelines will apply:

1. Failure to comply with OSHA standards, state safety regulations, all other federal laws and standards, Brookstone, L. P. Safety Manual, safety policy and client safety rules may be cause for dismissal.
2. Each superintendent shall maintain files containing Brookstone's safety manual, a copy of the 29 CFR 1926 OSHA standards and other related safety information distributed from the office.
3. Each jobsite shall maintain a first aid kit appropriate for the project.
4. All personnel will notify their supervisor immediately of any hazard observed.

Posting Requirements

OSHA and Texas Workers Compensation Commission (TWCC) regulations require the posting of several types of notices at each project site. The notices must be posted conspicuously at a place where all employees can see them or at the place where they report to work. On Brookstone, L.P. projects, notices shall be posted in the field office and/or a bulletin board outside. All postings will be bilingual (English and Spanish). The project Superintendent shall be responsible for posting, but may delegate this responsibility to other Brookstone, L.P. representatives.

1. Each job site shall post a job site evacuation plan and map posted on the jobsite.
2. Each site will have a crisis response procedures form with emergency phone numbers posted.
3. Each job site shall have a list including names, company and telephone number of all competent persons for each subcontractor on the jobsite.

Safety Inspections

Formal safety inspections are to be conducted by the Superintendent and turned in to the Safety Director on a weekly basis. All safety inspections are to be sent in to the Safety Director by the following Monday. If there is a life threatening condition observed, the Superintendent should contact the Safety Director immediately.

Safety Incident Report Card

All Superintendents and or Project Engineers must keep with them at all times while on the jobsite the safety incident report cards. Anytime a hazard is observed, it must be corrected immediately to prevent any injury. The Superintendent and or Project Engineer must fill out the card and send a copy of the card to the safety director at the end of each day. The Superintendents shall use these report cards at their weekly foreman's meeting to address the concerns further with the appropriate subcontractor. (See below)

BROOKSTONE

CONSTRUCTION MANAGERS | GENERAL CONTRACTORS

SAFETY INCIDENT REPORT

Date _____ Time _____
Job # _____ Supt. _____

Contractor: _____

Violation: _____

Corrected? Y / N (circle one)

Action Taken: _____

* Please complete and return to Safety Director.
3715 Dacoma Street, Houston, Texas 77092
Phone: 713.683.8800 | Fax: 713.680.0088

Jobsite Safety Orientation

Every employee on a Brookstone, L.P. jobsite, including all subcontractors, must complete the Jobsite Safety Orientation program before starting work. At the end of the orientation, each employee will receive a hard hat sticker to place on their hard hat. **No exceptions to this rule.**

General Requirements

1. Hard hats shall be worn at all times while in the construction area unless deemed unnecessary by Brookstone, L.P. Safety Director and Project Superintendent due to the stage of the project.
2. All Brookstone, L.P. employees, subcontractor employees, vendors and visitors shall wear ANSI Z87.1 rated eye protection at all times while on a construction jobsite.
3. Employees will wear proper work attire and use appropriate personal protective equipment when appropriate and/or required. No shorts or open shoulder shirts allowed.
4. Hard sole boots/shoes with leather uppers shall be worn unless special conditions exist.
5. Approved full body harness shall be used when appropriate. Safety belts are not allowed.
6. Proper respiratory protection and training will be provided and used when appropriate.
7. Hearing protection shall be accomplished in accordance with the hearing protection program section of this manual.
8. All electrical outlets shall be Ground Fault Circuit Interrupter (GFCI) protected and shall have cover plates installed. Where exposed to the weather, outlets shall be weatherproof rated.
9. All electrical tools and equipment will be properly grounded. Double insulated, U.L. approved, shockproof tools are acceptable. Defective tools will be red tagged and returned to the superintendent for repair or replacement.
10. Job sites shall be kept clean of trash material. Passageways and stairs in particular shall be kept clear and clean.
11. Horseplay on the job is strictly prohibited.
12. No employee will be permitted to work while under the influence of alcohol or narcotics. (See policy regarding illegal drugs, alcoholic beverages, etc.)
13. All project sites shall have potable water supply with disposable cups and trash receptacle.
14. All project sites shall have eye wash signage and eye wash facilities posted and reasonably accessed eye wash which shall include a 15 minute constant supply of tepid potable water.

15. A U.L. approved safety can will be used for all gasoline and other flammable liquid. All other gasoline cans are not permitted. Siphoning is not permitted. Proper storage is required.
16. Fall protection is required at and above six feet above a walking working level. This includes scaffolding (exceptions to this rule are ladders).
17. Adequate lighting for work areas, aisles, stairs, ramps, corridors, and storage areas shall be provided.
18. All exits shall be properly marked.
19. Fans, pulleys, electrical saws, grinders, etc. will be properly guarded and used in accordance with their designed purpose.
20. Ladders should have side rails extending a minimum of thirty-six inches above the walking working surface and shall be tied off.
21. Always inspect ladders before each use. If ladders are not in good condition, tag it out of service and remove from the jobsite.
22. Use tools for their intended purposes only.
23. Do not ride equipment loads, hooks, or headache balls. You are to remain seated with arms and legs inside the body of the moving vehicle.
24. Always have sufficient lighting on stairs, in walkways, basements and other work areas.
25. Do not block walkways, traffic lanes, or fire exits.
26. Never work under vehicles or equipment supported by jacks or hoists without protective blocking.

Excavation & Trenching

1. All trenches or excavations over four feet deep shall be benched, sloped or shored accordingly.
2. All trenches and excavations will have a ladder installed no more than twenty five feet from working employees and will be relocated as the work progresses.
3. No employees on a Brookstone, L.P. project shall enter any trench or excavation before a competent person has inspected and documented that it is safe to enter and work.

4. Should any condition become hazardous while you are in a trench or excavation, you are to get out immediately.
5. All excavated soil is to be placed away from the excavation edge a minimum of three feet to prevent material from falling back into the trench or excavation.
6. No employee is allowed to work alone while performing excavation, trenching, or shoring operations.
7. Do not work in excavations where there is standing or accumulating water without necessary precautions being taken to alleviate the hazard.
8. Removal of all protective systems will begin at, and progress from, the bottom of the excavation or trench.

Scaffolding

1. Each scaffold and scaffold component shall be capable of supporting, without failure, its own weight and at least four times the maximum intended load applied or transmitted to it.
2. Each working platform on a scaffold shall be fully planked or decked between the front uprights and the guardrail supports.
3. Guardrails and toe boards shall be installed on all open sides and ends of scaffold platforms six (6) feet or more above the ground or floor.
4. Scaffold planks shall not extend over the end supports less than six inches or more than twelve (12) inches.
5. Where planks on scaffold platforms are overlapped, the overlap shall not be less than twelve inches or secured to prevent movement. Planks shall overlap so that both planks are bearing on a scaffold support at the point of overlap.
6. An access ladder or equivalent safe access shall be provided to and from the platform of all scaffolds.
7. Free-standing mobile scaffold towers shall not be higher than four times the maximum base dimension.
8. Supported scaffold poles, legs, posts, frames, and uprights shall bear on base plates and mud sill or other adequate firm foundation.
9. Each scaffold on a Brookstone, L.P. project must have an inspection tag located at the ladder and be inspected prior to each working shift.

10. Scaffold X-bracing cannot be used as part of the guardrail system.

Ladders and Stairways

1. The use of ladders with broken or missing steps or rungs, broken or split side rails, or other defects is prohibited.
2. Job built ladders shall be built to ANSI specifications which may be provided upon request.
3. Side rails of extension ladders or job built ladders shall extend not less than thirty-six inches above the walking working surface.
4. The ladder shall be tied, blocked, nailed or otherwise secured to prevent movement.
5. The pitch of the ladder shall be such that the horizontal distance from the top support to the foot of the ladder is one-quarter (1/4) of the length of the ladder between the top support and base.
6. Metal ladders shall not be used for electrical work or where they may contact electrical conductors.
7. Feet of extension ladders shall be equipped with safety shoes.

Personal Protective Equipment

1. All employees and visitors on a Brookstone, L.P. Project Site shall wear hard hats unless deemed unnecessary by Brookstone, L.P. Safety Director due to the stage of the project.
2. All employees and visitors on a Brookstone, L.P. Project Site shall wear ANSI Z87.1 rated eye protection at all times while on a construction jobsite.
3. All employees exposed to sound levels in excess of those shown in Table D-2 of the OSHA regulations shall wear hearing protection meeting the requirements of OSHA 1926.101, (a) through (c).
4. All employees, vendors and visitors shall wear approved orange or green safety vest while on the project. The superintendent will make the decision when the safety vests are no longer needed.

Electrical Safety

1. All electrical work installation and wire capacities, both temporary and permanent, shall be in accordance with the National Electric Code.

2. All electrical outlets shall be G.F.C.I. protected and shall have cover plates installed. Where exposed to the weather, outlets shall be weatherproof rated.
3. Extension cords used with portable tools and equipment must be of a heavy duty 3-wire type and must be 12 gauge or greater.
4. Aisles, stairs and walkways shall be kept clear of electric cords or cable so as not to present a tripping hazard.
5. Cords with worn, frayed or broken insulation or missing the ground prong shall not be used.
6. All distribution panels, circuit breaker panels and fuse boxes which may be exposed to water shall be protected so that water does not enter.
7. All electrical tools and equipment will be properly grounded. Double insulated, U.L. approved, shockproof tools are acceptable. Defective tools will be red tagged and returned to the superintendent for repair or replacement.

Aerial Lifts

1. Only trained and authorized persons should operate an aerial lift.
2. Belting off to an adjacent pole, structure or equipment while working from an aerial lift shall not be permitted.
3. A safety harness shall be worn and a lanyard attached to the boom, basket platform or railing when working from an aerial lift.
4. Brakes shall be set and, when outriggers are provided, they shall be fully extended and set in place on pads or a solid surface.
5. An aerial lift shall not be moved when elevated in the working position with workers on the lift unless the equipment is specifically designed for this type of operation in accordance with the manufacturer's specifications.
6. Platforms of aerial lifts shall be equipped with standard guard rails and toe boards.

Compressed Gas Cylinders

1. All compressed gas cylinders, whether full or empty, in use or in storage, shall be secured in an upright position at all times.
2. Cylinders not in use shall be capped.

3. When in storage, oxygen cylinders shall be separated from other types of compressed gas cylinders by at least twenty (20) feet or by one-half (1/2) hour fire proof barrier.
4. The storage of propane cylinders inside buildings is prohibited.

Housekeeping

1. Good housekeeping is essential in accident prevention and should be part of the daily routine with clean-up being a continuous procedure.
2. All excess material shall be stacked with due regard to safety and allowance made for easy access.
3. The working area and all stairways, ladders, and passageways shall be kept free from loose materials and debris.
4. Spills of oil, grease, or bulk cement shall be removed immediately, in accordance with local, state, and federal regulations.
5. Areas around saws or other wood working equipment shall be kept clean and free of excess scrap, chips, and sawdust.
6. Paper drinking cups, lunch debris and trash shall be placed in trash barrels or dumpsters for removal from the area.
7. Employees must ensure that their work area is kept clean, neat, and orderly at all times. Employees identifying trash or other debris are responsible to ensure a pick up or clean up of whatever conditions exists, no matter who caused or created it.
8. Liquid spills must be controlled and cleaned up immediately by the first person to identify the wet condition.
9. **Remember, a clean job is a safer job.**

Lasers

1. Only qualified and trained employees shall be permitted to operate lasers.
2. All employees working in areas in which a potential exposure to direct or reflected laser light of at least five milli-watts, shall be provided with laser eye protection.
3. Areas in which lasers are used shall be posted with standard laser warning placards.
4. Lasers shall be shut off when not in use and shall not be left on when unattended for more than fifteen (15) minutes.

5. Laser beams shall not be directed at employees.
6. Lasers with outputs greater than 10 milli-watts shall not be permitted.

Tools

1. Keep all loose tools in a toolbox or secure them against falling or dropping from work surfaces.
2. Do not use worn or damaged tools. Do not use tools with cracked, broken or loose heads or handles.
3. Know the correct use of power and hand tools before using them. Use the right tool for a particular job and use them only for the purpose for which they are intended.
4. Powder actuated or assisted tools are to be operated only by a certified/qualified operator. Never point a powder-actuated tool at anybody. Before using a powder-actuated tool, inspect it to make sure that all moving parts operate freely, and that the barrel is free from obstruction. Do not load a powder-actuated tool unless it will be used immediately.
5. Operate equipment and tools within rated capacity and at safe speeds.
6. Consider all electric wires and cords as “live” until checked.
7. Keep a safe distance from “live” electricity.
8. Have electrical power tools and equipment properly grounded. Inspect tools and cords for damage before each use.
9. Only qualified persons are to repair electric tools or equipment.
10. Power saws will be equipped with guards.
11. Portable grinders will be equipped with guards.
12. Disconnect the tool from the power source before changing blades or bits or attempting repair or adjustment. Never leave a running tool unattended.

Cranes & Other Heavy Equipment

1. Stay completely clear of overhead loads. Never walk under a suspended load for any reason.
2. Stay clear of swinging counterweights or superstructures. Swing radiuses should be barricaded, creating a restricted access zone.

3. Do not climb on or off moving equipment.
4. All equipment, cranes, and booms are to be kept at least ten (10) feet from energized power lines.
5. Only qualified employees are allowed to operate cranes.
6. Tag lines are to be used on hoisted loads.
7. Back up alarms shall be operable.
8. Anti-two block required.
9. Evidence of documented Daily/Pre-shift inspections.
10. Documented evidence of competent rigger's training.
11. Crane must be current on the annual inspection before operating on a Brookstone, L.P. Project.

CRISIS RESPONSE PROCEDURES

First Hour Checklist for Senior Person On-Site

- Call 9-1-1
- Contact Chris Roberts, Safety Director, Cell: 281-414-7018, Office: 713.683.8800
- Initiate site control and make certain that all employees are accounted for.
- If the site will be shut down, tell workers when they are to report back to work. Also, direct information requests from outside groups to you. Keep selected individuals on-site to help with the incident.
- DO NOT** move anything that could be classified as evidence.
- Ensure telephone coverage at the site.
- Notify the President, Steve Dishman, Cell: 713-304-2642, Office: 713.683.8800
- Post workers to restrict entry to the site.
- Establish a command center.
- Notify the owner/developer of the project.
- Select a temporary spokesperson to issue a buy-time statement if the media arrives (see below)

Who to Contact

	<u>Day</u>	<u>Night</u>	<u>Cell</u>
Superintendent:			
Project Manager:			
Safety Director:			
Owner/ Developer:			
MEP Foreman:			

What to Say If the Media Calls

“My name is (_____) and I am (title) with Brookstone, L.P. The incident has just happened and I am not prepared to answer any questions at this time. Please stay in this safety area so we can do our job and take care of the situation. I need to return to the site, but either (spokesperson) or I will be back at (time) with an update. Thank you.”

IMPORTANT: Do not take any questions at this time. If badgered, simply state that you need to get back to the site and you will return at the stated time.

What is a Crisis?

A crisis is any incident that can focus negative attention on a company and have an adverse effect on its overall financial condition, its relationship with its audiences, and/or reputation within the marketplace.

Why do you need to be ready for one?

It's said that there are two types of companies...those who have already dealt with a crisis and those who will. Every company needs to be prepared for the unexpected. They also must be equipped with the skills necessary to portray their company in the best possible light while working under the worst possible circumstances.

Do's and Don'ts of Working with the News Media

- **DO** talk. Saying little is better than saying nothing. Explaining why you can't talk is better than stonewalling. If you want your side of the story told, you must tell it. If you don't., reporters will get a version elsewhere...perhaps from a disgruntled employee that was laid off last week, or a worker who has just witnessed his best friend getting hurt or killed.
- **DO** tell the truth. Reporters will find it out anyway so be honest and accurate when giving information. This doesn't mean you have to give every detail, but be truthful. If you don't know the answer, say so! It's not a crime to say "I don't know" or "I'm not absolutely certain about that"...as long as you follow it up with "but I'll find out and get right back with you."
- **DO** respond quickly. If you don't, the wrong story may be told and that is tough to erase.
- **DO** emphasize the positive and communicate your corporate message. Remember to emphasize the good safety measures taken, the minimal damage because of good teamwork by your employees, and the steps the company is taking to minimize the effect of the emergency on the community.

- **DO** stay away from liability issues. Don't talk about who is responsible, don't make any accusations, and don't give out company or individual names. Whatever you say may become part of a legal issue, so be as general as possible.
- **DO** take control. If there is bad news, release it yourself before the reporter digs it up and tells the world.
- **DO** create visual analogies. The old saw "a picture is worth 1,000 words" applies here. Examples are powerful as well, e.g. "The affected area covers 40,000 sf, which is the approximate size....."
- **DO** condense your information. Remember, the average sound bite is 7.3 seconds. Try to keep your response to no more than three sentences. The first sentence should be your direct response and the next one to two sentences will support / explain your response.
- **DO** make sure your information is accurate. It should come from a reliable source and you should understand the details thoroughly.
- **DO** make sure the reporters know who the spokesperson is. The corporate spokesperson should be the only person authorized to disseminate information to the outside world. It is very important that you "speak with one voice." Keep in mind that now information should be released without being approved by upper management and legal counsel.
- **DON'T** say "no comment". This statement implies guilt. If you don't know the answer to a question, tell the reporter you don't know, but will try to find out. If the question may lead to an embarrassing answer, give as much information as you can in as positive light as possible. If you make a mistake, admit it. Avoid excuses. Explain how you're planning to make things right.
- **DON'T** be trapped into predicting the future...**NEVER** speculate!
- **DON'T** say anything "off the record". If you don't want it used, don't say it.
- **DON'T** wear sunglasses when being interviewed. You'll be perceived as being "shifty" and hiding something.
- **DON'T** discuss damages or estimated costs.
- **DON'T** discuss any facts relating to insurance, such as amounts and terms of coverage, name of carrier, possibilities of settlements or reimbursements.

- **DO** think before answering. Taking some time before you respond is perfectly acceptable. You're in control of your response...not the reporter. Don't allow them to rush you. If you don't understand the question, ask the reporter to rephrase it.

Getting Ready for the Interview

BUY-TIME STATEMENT

If the incident has just happened, you won't have any **verifiable** information to release to the news media. However, the media will expect someone to say something. Avoid the urge to stonewall the media while you're gathering facts. Instead, deliver what is called a "buy time" statement. This acknowledges the situation but doesn't really divulge any information. It would go something like this:

"My name is Doug Anderson and I'm the Project Manager for Brookstone, L.P. The incident has just happened and I am not prepared to answer any question at this time. Please stay in this safety area so we can do our job and take care of the situation. As you can see, I'm pretty busy right now and need to return to the site, but either (spokesperson) or I will be back by (time) with an update. Thank you."

You can count on the reporters pestering you for additional information, but you are not in a position to answer questions at this juncture. If a reporter starts asking you questions, simply say "That all I can confirm at this time. I'm sure you understand that we need to deal with the emergency at hand and gather some verifiable information for you. Thanks for your patience."

Remember; if you say you'll be back in thirty (30) minutes be there! Even if it's only to say that you still don't have any facts. You can usually get away with giving two "buy time" statements in the first few hours of a crisis. After that, you better have something to say.

DETAILED STATEMENT

As you receive information that has been verified by a trusted source, you'll need to live up to your promise of delivering that information to the new media. Always get your statements approved by upper management, and legal counsel if possible, before release. Here are some examples.

Example...Detailed Statement

"My name is _____. I'm (position) _____ with Brookstone, L.P. At approximately (time) _____, one of our workers accidentally hit an underground electric cable, disrupting service to _____. At this point, we have contacted the utility company, whose crews are on their way to repair the line. We don't know how extensive the damage is, but I'm sure the utility people will be able to provide you with those details once they review the situation."

"The location of the line break is approximately _____."

“Because our employees adhered to our strict safety policies, no one was injured and there was no further damage to the area.”

“At this point, that’s all the information I have. Our corporate spokesperson is on the way to provide you with further details, but right now all I ask is that you stay in this area, away from where the line break occurred, so emergency personnel and utility employees will be able to work on the line. We’ll keep you posted on any further information.”

Example...Injury Statement (*Never* release the name until the next of kin have been notified.)

“Joe Smith, 20, of Houston, Texas was injured Tuesday morning at 8:45 a.m. on the Brookstone construction site in Houston. Smith, who is a carpenter apprentice for (Company), suffered multiple injured as a result of the 30 foot fall. He is reported in critical condition at Memorial Hospital in Houston. Right now, our focus is on Mr. Smith, his family, and cooperating fully with the investigation to find out exactly what happened. We will keep you advised of any further developments.”

Example...Fatality Statement (*Never* release the name until the next of kin have been notified).

“We are deeply saddened to report that Joe Smith, 20, of Houston died as a result of a fall that occurred Tuesday morning on the Brookstone construction site in Houston. Smith, who was a carpenter apprentice for the (Company), suffered multiple injured as a result of a thirty (30) foot fall. Our focus right now is on the family and friends of Mr. Smith as well as on the investigation of the accident.”

Get Ready for Questions

Here are some questions that might arise. Also included are some possible responses.

What caused this accident?

Possible response: “The cause of the accident is not known at this time. A thorough investigation is currently underway and we will be better able to answer those questions when the investigation is completed.”

How many, and who, were injured/killed?

Possible response: “At this time we can confirm _____. I’m sure you’ll understand that we cannot release any names until the families have been notified.”

What is the estimated damage in dollars?

Possible response: “That information will not be available until the extent of the damage has been determines. We will be happy to share that information with you as soon as it becomes available.”

Have you had any accidents in the past? What’s your safety record?

Possible response: “Right now, all of our resources are committed to the investigation. I’ll be happy to gather that information and deliver it in our next update.” (However, if you have a strong safety record, mention it.)

Will you step up your safety measures as a result of this accident?

Possible responses: "Brookstone has had, and will continue to have, a strong safety program that is enforced by our Safety Director. There is no higher priority than the safety of our employees and those who work on the site."

Can we come on site to take pictures?

Possible response: "Once the site has been secured, access will be determined by _____. We'll keep you informed of our progress."

I understand that this project is behind schedule. Do you think this accident was caused by pushing your workers too hard to make-up for lost time?

Possible response: "Let me be very clear in saying that Brookstone would never compromise safety for schedule."

INCIDENT REPORTING AND RECORD KEEPING REQUIREMENTS

Brookstone, L.P. uses investigations, reporting and recording of all incidents to detect trends, whether or not they result in property damage, an injury or illness. From this reporting we review established protocols for their effectiveness and when necessary revise the established protocol.

The Customer shall be assured, Brookstone, L.P. is professionally investigating the accident and/or incident and will make the necessary program adjustments or recommendations to prevent recurrence.

1. An incident/accident investigation is not a blame finding endeavor. It is a fact-finding effort to eliminate occurrence of similar incidents in the future.
2. Employees must report all accidents, injuries and illnesses to their superintendent immediately to ensure the proper follow-up actions are taken, which may include proper medical treatment and/or investigation.
3. Key definitions:
 - a. Incident: Is the unplanned result of a behavior.
 - b. Hazard: Is an incident without adequate controls applied.
 - c. Accident: Is an incident that results in damage or injury.

All accidents result from incidents, but not all incidents result in accidents.

Reporting Procedures

1. Employees must report all accidents, injuries and illnesses to their Superintendent immediately to ensure the proper follow-up actions are taken, which may include proper medical treatment and/or investigation.
2. The Superintendent must report the accident, injury or illness to the Safety Director as soon as practical, where additional determinations of follow-up actions and the investigation process will be made.
3. If a serious accident occurs to an employee, only management will contact employee's family.

Incident Investigation Procedures

In order to eliminate injury and damage, it is important to perform thorough, in-depth investigations when incidents occur.

The Superintendent must investigate all near miss incidents. The incident investigation will include, but is not limited to:

1. Statements of facts from the person(s) involved in the incident.
2. Statements of facts from the involved person's Superintendent.
3. Statements of facts from any employee witnessing the incident.
4. Statements of facts from any witness to the incident not working for Brookstone, L.P.
5. Date and time of incident.
6. The Safety Director must be notified within one (1) working day.

Accident Investigation Procedures

An investigation is not a blame finding endeavor. It is a fact-finding effort to eliminate occurrence of similar accidents/incidents in the future.

1. The Superintendent must complete the investigation report(s). This must be completed as soon as possible following the accident.
2. In the event of a serious or fatal accident, the Safety Director may assign this responsibility to another member of management.
3. A formal investigation must be conducted whenever an injury or property damage occurs. Participants in the investigation process should be:
 - a. The person(s) involved/injured in the accident.
 - b. The Superintendent or Supervisor of the person(s) involved.
 - c. Any employee witnessing the accident.
 - d. Any witness to the accident not working for Brookstone, L.P.
4. The investigation should review the scene and then review all facts pertaining to the accident in a conference environment.
5. The investigation process should not be limited to only first aid occurrences, but should be utilized in the event of non-injury accidents as well.
6. A review of the facts, identified causes, triggers, and actions to prevent recurrence should be documented and communicated to all employees throughout the jobsite via safety meetings.
7. All accidents involving exposure to potentially hazardous materials in potentially reportable quantities as defined by Environmental Protection Agency, Resource

Conservation and Recovery Act, must be reported to the Safety Director. It is important to report all releases or exposures even though the accident may be considered minor or no adverse health effects or symptoms are apparent at the time.

8. A copy of the investigation report shall be placed in the Safety Director's file, listing all affected employee(s).
9. All required reports must be completed within twenty-four (24) hours, including:
 - a. Employer's First Report of Injury
 - b. Employers Supplemental Report of Injury (where required by state law).
 - c. A Company investigation report.

Recording and Record Keeping

Incident Report

1. Anytime there is any occurrence out of the ordinary which could have or might possibly result in an accident or injury, an incident report will be required. This could be:
 - a. A fender bender in the project parking lot.
 - b. Accidentally damaging another Contractor's work.
 - c. The Customer involving him or herself in our installation when asked not to.
 - d. Employee fighting.
 - e. Burglary or theft.
 - f. Anyone coming into contact with live energized parts, even though they appear to be alright.
2. There can be numerous things that could trigger an incident report.
3. The Superintendent must understand the risk involved with every incident. For incidents not involving injury, the Superintendent must make a judgment as to the importance of documenting an occurrence.

First-Aid Log

The First-Aid Log is the primary project injury log. All injuries/illnesses (job related or personal) treated or reported (actual or alleged) must be entered into the log, no matter how minor. There are no exceptions to this recording requirement.

1. The original First-Aid Log (Tab 20) must be kept on-site at all times.

Employer's First Report of Injury

1. An Employer's First Report of Injury shall be completed for all injuries that require first aid or referral to a physician for either evaluation or treatment.
2. This report and required accompanying reports must be sent to the Safety Director within twenty-four (24) hours following the injury/illness.
3. The site Project Superintendent must initial every First Report of Injury signifying that he is fully aware of the accident.
4. The Safety Director will review the Employer's First Report of Injury and will route to the President and Controller for review and action as necessary.

OSHA Record-Keeping Procedures

1. The OSHA 300A Summary log is to be filled out at the beginning of the year by the Safety Director. The Safety Director will maintain the OSHA 300 log for all Brookstone, L.P. locations in the main Brookstone, L.P. office located at 3715 Dacoma Street, Houston, Texas 77092.
2. The OSHA 300A Summary Log for the previous year will be posted at the site in clear view in the project trailer, or any other normal gathering place for employees during the months of February, March and April.
3. The Safety Director, President and Controller will review all "Employee's First Report of Injury Forms". The Safety Director will be responsible for recording all injuries which are determined to be recordable.

NEW EMPLOYEE SAFETY ORIENTATION

Each prospective employee must pass a pre-employment physical. Administration of this policy is the responsibility of the Controller.

Every new employee must attend Brookstone's safety orientation training program administered by the Safety Director and drug screen before being released to work. At a minimum the training will consist of:

1. Fall Protection
2. Ladders Safety
3. Personal Protective Equipment
4. Fire safety
5. Electrical Safety
6. Trenching & Excavation
7. Hazard Communication & Material Safety Data Sheets
8. Scaffolding Safety
9. Hazard Recognition

In addition to the safety orientation training, each new employee will be given a copy of Brookstone's safety manual.

Each employee must also complete the jobsite safety orientation with the superintendent or project engineer before he or she can start work.

HEALTH HAZARDS & ENVIRONMENTAL CONTROLS

Maintenance of Safety Installations

Safety rules and regulations established for the project site require certain safety installations to be provided by the Subcontractors and/or its second tier subcontractors. Such installations may include, but not be limited to the following:

1. Guardrails
2. Safety Nets, both horizontal and vertical
3. Overhead protection
4. Temporary fire protection
5. Signs and Posters
6. Temporary lighting
7. Rubbish containers
8. Communication systems, signals and alarms

Subcontractors and their workers shall respect all such installations and fully cooperate in their maintenance. Where an employer must remove or relocate safety installations to facilitate the work, the employer shall provide an alternate means of protections for its employees during the work.

Where safety installations must be removed or relocated on a large scale, or for extended periods of time, or permanently, or the contractor does not have the means of reinstallation, the contractor shall make advance arrangements for coordination with Brookstone, L.P. All subcontractors shall instruct their workers on the requirement. OSHA 1926.16 Rules of Construction.

Housekeeping

Not only does poor housekeeping on construction projects creates unsafe walking and working conditions due to tripping hazards, but it also creates an ever-present fire hazard due to the flammable and combustible nature of most construction debris

All subcontractors shall participate in the housekeeping program established by Brookstone, L.P. at the start of the project. Responsibilities for clean up and removal of debris will be distributed to all involved in the project. The following housekeeping rules shall be enforced:

1. Plan ahead and set up schedules for prompt emptying of rubbish containers. Full containers shall be emptied promptly and replaced with empty containers. Allow sufficient time in schedules for rubbish removal.
2. Hoses, extension cords, welding leads, etc. should be placed in such a manner not to create a tripping hazard.

3. Combustible or flammable debris shall be cleaned up and removed on a daily basis. Accumulations of this type of debris are prohibited.
4. Construction debris shall be cleaned up daily.
5. In no case shall construction debris be permitted to become strewn or accumulated in occupied areas outside of construction areas. Debris produced from construction activities in such areas shall be cleaned up and removed as it is produced. The following areas shall be kept clear of debris at all times.
 - a. Walkways
 - b. Aisles
 - c. Stairways
 - d. Ladder ways
 - e. Ramps
 - f. Loading docks
 - g. Entrance lobbies and landings
 - h. Entrances to the project
6. When debris is dropped through holes or openings in a floor without the use of chutes, the area onto which the debris is dropped shall be completely enclosed with barricades not less than forty-two (42) inches high and not less than six (6) feet back from the projected edge of the opening above. Employees shall not enter the area while debris is being dropped.
7. All debris shall be kept back at least ten feet from the open sides of floors and at least six (6) feet back from the edges of floor openings until cleaned up and removed.
8. Nails may not be left protruding from lumber removed.
9. Oil and grease spills shall be cleaned up at once.
10. Where sweeping of debris from floors may create dusty atmospheres, sweeping compound shall be used.
11. Where opening to rubbish chutes may permit material to ricochet or fly out of the openings or where the openings present a falling hazard to employees, the opening shall be equipped with a cover of three-quarter (3/4) inch plywood or its equivalent or with a two (2) inch x four (4) inch bar across the opening. Covers or bars shall be kept in place when the opening is not in use. Where the openings are large enough to admit a wheelbarrow, a substantial wheel stoop shall be installed on the floor in front of the openings.

12. In no case shall the bottom discharge of a chute be left in such a condition as to permit employees to inadvertently walk or enter under the open end. When there is no rubbish container under the chute, the area under the discharge shall be barricaded.
13. Where construction materials, tools, supplies and equipment must be moved through occupied areas, one employee shall serve as flagmen to warn occupants of the hazards and direct them away from or around the move.

Work in Occupied Structures

All subcontractors' construction activities taking place in or close to occupied structures create special safety hazards for the occupants, increasing our exposure to liability claims. All Subcontractors must be aware that occupants are unfamiliar with construction processes and that special controls are required for the safety of the structure and its occupants.

All Subcontractors shall review in advance all construction work in occupied structures which may create safety hazards for the occupants or the structure with the building manager. Safety controls shall be revised at the same time. This will allow both, to safely coordinate their work and permit building management to implement their own safety controls and notify occupants.

Where any subcontractors do any work in occupied structures which may require any of the controls set forth below, the work shall not proceed without approval of the General Contractor at least twenty-four hours in advance of the work.

Environmental Controls for Occupied Structures

1. Where occupants may be exposed to excessive noise and vibration, alternate methods and equipment may be employed. Tools, machinery and other construction equipment with special mufflers and sound silencing accessories are available for use in such circumstances. Where feasible, the work may be scheduled during off hours so that occupants are not adversely affected by the work.
2. Where occupants may be exposed to welding flashes, laser beams, or other forms of radiation, the work shall be screened.
3. Where occupants may be exposed to contaminated atmospheres due to gases, vapors, fumes, dusts, mists, or odors, the work shall be isolated from occupied areas by temporary closures or the affected areas ventilated by natural or mechanical means as required reducing the exposure.
4. The use of equipment powered by internal combustion engines inside of closed structures is prohibited.
5. Where fire or smoke alarms may be set off due to construction activities, the Prime/Trade Contractor shall coordinate the work with the building management to

prevent false alarms. Coordination may require the temporary isolation or shutting down of alarm systems.

6. Where smoke, fumes, odors, etc. from construction activities may be dispersed into occupied areas through air intakes, air handling systems, etc., the Superintendent shall coordinate such activities with the building management to control the hazard. Coordination may require the closing of intakes or shutting down air handling systems.

Closures and Barricades

1. Construction areas and activities in occupied structures shall be isolated from occupied areas by the installation of temporary partitions, fences, barricades or other means as required to prevent unauthorized or inadvertent entry by occupants.
2. All temporary closures shall be free of projections which may present tripping hazards to occupants, or upon which they may become entangled, impaled or bump into.
3. Doors or gates equipped with locking devices shall be installed at all points of entry to construction areas and shall be closed and locked during non-working hours.

FALL PROTECTION

Brookstone, L.P. has adopted the “6-FOOT RULE”, which translates to any task on any Brookstone, L.P. project, which requires the employees to work six (6) feet or more above any walking working surface to have means of fall protection (harness and lanyard, guardrails, etc.)

Guard Rail Installation and Maintenance

1. Subcontractors shall plan ahead for the prompt installation and maintenance of guarding as required in these requirements.
2. Subcontractors shall assign responsibilities for the installation and maintenance of guarding to the appropriate parties and enforce their compliance with these requirements.
3. Subcontractors shall provide for daily inspection of all areas where guarding is in place or may be required. He shall place particular emphasis on areas of high activity or rapidly changing conditions where the need for installation and maintenance may be most critical, and issue instructions for prompt corrections to guarding deficiencies found.
4. Subcontractors shall see that the design and installation of guarding is readily adaptable to the type of work to be performed in the guarded areas. The guarding shall facilitate removal and replacement where required, be readily maintainable, and provide maximum protection for employees engaged in the work.
5. Where guarding must be removed to facilitate the work in progress, the guarding shall be replaced in original condition upon completion of the work and the unguarded area shall not be left unattended until the guarding is replaced. Subcontractors shall enforce this requirement with the responsible parties.

Guarding Requirements

1. Every open sided floor, balcony, mezzanine, platform or work surface six (6) feet or more above adjacent floor or ground level shall be guarded with a standard guard rail system.
2. Every floor opening measuring more than two (2) inches in its least dimension in any floor, roof or platform shall be guarded with a cover or a standard guardrail system.
3. Every stairway opening, ladder opening or ladder platform shall be guarded on all exposed sides with a standard guardrail system.

4. Every opening for manholes, pits, hatches, trapdoors, chutes, and skylights shall be guarded with a cover or standard guardrail system.
5. Every wall opening from which there is a drop of more than six (6) feet above the floor shall be guarded with a standard guardrail.
6. Every extension platform outside an open floor or wall opening shall be guarded on all open sides with a standard guardrail.
7. Every ramp or runway four (4) feet or more above the floor or ground level shall be guarded on all open sides with a standard guardrail.
8. The above guarding requirements are applicable to the completed sides and opening of decks and concrete formwork of all types. Perimeter guarding of formwork shall be installed as completed sides of the formwork are developed.
9. On temporary planked floors or temporary metal-decked floors, a single safety railing of wire rope cable installed approximately forty-two (42) inches above the floor, shall guard the periphery of the floor. Perimeter cable shall be installed as completed sides of the floor are developed.
10. Temporary planked or temporary metal-decked floors shall be covered over the entire surface. All unused openings shall be covered with plank or metal deck secured against accidental displacement.
11. The uncompleted or leading edge of any temporary floor, whether of planking, metal deck or concrete formwork, shall not be left unguarded or unattended for extended periods of time due to delay or interruption of the completed installation. In such cases, access to the open end of the floor shall be closed to employees by wire rope cable or barricading off the floor at least ten feet back from the open end of the floor.
12. Where subcontractors install guarding on floors under their control, such guarding may be left in place to service the long-term needs for guarding of the project, providing that it meet all of the requirements.
13. Every flight of stairs having four (4) or more risers shall be equipped with stair railings or handrails.
14. Risers and treads on temporary stairs shall be of uniform height and width.
15. Permanent steel or metal stairways and landings with hollow pan type treads that are to be filled with concrete or other materials, when used during construction, shall be filled to the level of the nosing with solid materials.

EXCAVATION & TRENCHING

Brookstone, L.P. Site Supervision & Safety Director shall enforce the following safety requirements for excavating work:

1. Prior to opening an excavation, effort shall be made to determine whether underground installations; i.e. sewer, telephone, water, fuel, electric, gas lines, etc. will be encountered and if so, where such underground installations are located. When the excavation approaches the location of such an installation, the exact location shall be determined, and when it is uncovered, proper supports shall be provided for the existing installation. Utility companies, authorities and if necessary Local Municipal Agencies shall be contacted and advised of proposed work prior to the start of actual excavation.
2. The walls and faces of all excavations in which employees are exposed to danger from moving ground shall be guarded by shoring, sloping to the proper angle of repose, or some other equivalent means.
3. The soil test shall be used as a guideline for cutting back the excavation sides to the proper angle of repose. Any shoring system being used on excavations twenty feet deep or less should use the suggested design systems as offered in the OSHA standard. Any shoring systems that are deeper than twenty feet or are different than the suggested OSHA designs shall have drawings on them. These drawings must be stamped by an in state P.E. Copies of the shoring system drawings must be on site during the excavation activities with a copy given to the Brookstone, L.P. Safety Director.
4. All subcontractor firms completing the excavation work shall have a Designated Competent Person on site during excavation operations. The excavation shall be inspected before and during excavation activities, after every rainstorm or other hazard increasing occurrence. Daily inspection logs shall be kept and made available to Brookstone, L.P.
5. All excavations four feet or more in depth shall have a means of egress every twenty-five (25) feet. This means of egress may be a ladder, stairway or ramp.
6. In excavations which employees may be required to enter, excavated or other material shall be kept at least three feet from the edge of the excavation.
7. Water shall not be allowed to accumulate in an excavation. Diversion ditches, dikes, or other suitable means shall be used to prevent surface water from entering an excavation and to provide adequate drainage of the area adjacent to the excavation.

8. Adequate physical barrier protection shall be provided at all remotely located excavations into which persons may fall. Well, pits, shafts, etc., shall be barricaded or covered.
9. Sides of trenches more than four (4) feet deep shall be shored or sloped back to the angles of repose.
10. Portable trench boxes or sliding trench shields may be used for the protection of employees in lieu of shoring or sloping. They shall be designed and constructed to provide protection equal to or greater than shoring required for the trench.
11. Open excavations in the public way shall be securely covered over with two (2) inch planking or three-quarter (3/4) inch plywood or its equivalent, or guarded on all open sides with a standard guardrail during non-working hours.
12. When mobile equipment is used or allowed adjacent to excavations, substantial stop logs or barricades shall be installed.
13. All pits, shafts, or steep sided excavations shall be covered with two inch planking or three-quarter inch plywood or its equivalent, or guarded on all open sides with a standard guardrail during non-working hours.

Protection from Live Systems

Prior to any work that may accidentally interrupt live systems, (mechanical, electrical, sewage, hydraulic, pneumatic, etc.); the subcontractors shall review and coordinate the work with the representative utility company, authority or local Municipal Agency and with trades doing the work. Proper safeguards shall be implemented as required to prevent accidental interruption of such systems. Work requiring review and safeguards may include demolition and any blind penetration of floors, walls, and ceilings.

All live systems whether they are mechanical, electrical, sewage, hydraulic, pneumatic, etc. shall be properly identified and location verified. In the event these systems may have to be temporarily shut down, the authorized representative from the utility company or Local Municipal Agency shall shut the system down and when necessary reactivate it.

FIRE PREVENTION & PROTECTION

All employees will be trained to prevent fires while performing their work, and in the event of a fire will be trained to protect employees from fire hazards.

Key Definitions:

1. Competent Person: One who is capable of identifying existing and predictable hazards in the surroundings or work conditions which are hazardous or dangerous to employees and who is authorized to take prompt corrective measures to eliminate the hazard or remove the employee from the hazardous condition.
2. Safety Trained: An employee trained by a Competent Person to recognize the hazards associated with fires and fire extinguisher.
3. Fire Watch: An employee trained in fire extinguisher use, which will look for stray sparks and ignition of other fire hazards and keep unauthorized persons out of the hot work area.

All activities involving open flames or producing heat or sparks including brazing, cutting, grinding, soldering, and arc welding require special consideration.

1. All employees are expected to take those actions necessary to prevent fires in the workplace. Each work place will be arranged and equipped as to prevent or at least control fire hazards, first to employees, then property.
2. All work areas, where there is a potential for fires to occur, must have available and maintain proper fire extinguishers so as to quickly extinguish any small and incipient stage fires before a greater risk to employees safety and property can occur.
3. Brookstone, L.P.'s employees do not fight fires without proper training. Sound judgment must be used for small extinguishable fires. If a small inconsequential fire, that could easily be extinguished, is left unattended, it could grow and cause severe damage to the workplace. On the other hand, if a fire grows too quickly into a blaze, do not try to extinguish it, back away and call the fire department.
4. The company will never risk the safety of our employees by requiring them to fight fires to save property...let the fire department handle the fire and be ready to assist if requested in a non-hazardous capacity.
5. Keep storage and working areas free of trash.
6. Place oily rags in an OSHA approved covered container.

7. Do not refuel gasoline-powered equipment in a confined space, especially in the presence of an open flame such as a furnace or water heater or a spark producing source.
8. Do not refuel gasoline-powered equipment while it is hot.
9. Keep flammable liquids stored in tightly closed, self-closing, spill-proof containers. Pour from storage drums only what you'll need.
10. Store flammable liquids away from spark-producing sources.
11. Use flammable liquids only in well-ventilated areas.
12. Look for old wiring, worn insulation and broken electrical fittings. Report any hazardous condition to your supervisor.
13. Prevent motors from overheating by keeping them in good working order. A spark from rough-running motor can ignite the oil and dust in it.
14. Utility lights should always have some type of wire guard over them. Heat from an uncovered light bulb can easily ignite ordinary combustibles.
15. Do not misuse fuses. Never install a fuse rated higher than specified for the circuit.
16. Investigate any appliance or electrical equipment that smells strange. Unusual odors can be the first sign of fire.
17. Do not overload wall outlets. Load them for their intended use and ratings. Overloading them can cause overheating of the wiring system and could lead to a fire.

Training

1. All employees will be instructed in the proper use of fire extinguishers and fire prevention methods.
2. Fire drills will be held as needed to familiarize employees with the emergency/fire response procedures for the work site as well as the location and operation of fire extinguishing equipment.
3. Fire safety is to be covered in the site safety meetings and specifically covered in the site safety meetings when the condition of the project offers a potential for fires.

Inspection and Storage

1. The Competent Person or his/her designee must routinely inspect all fire extinguishers at least monthly.
2. In addition to the monthly inspection, an in-depth/thorough inspection shall be completed at regular intervals, not more than one year apart or when specifically indicated by a routine inspection. Extinguishers shall be thoroughly examined and/or recharged or repaired to ensure operability and safety, or replaced as needed.
3. A Competent Person will perform inspection and maintenance of all fire extinguishers.
4. Extinguishers removed from their locations to be inspected, repaired or recharged shall be replaced by spare extinguishers of the same type during the period they are gone.
5. Each extinguisher shall have a durable tag securely attached to show the date of the last thorough inspection, maintenance or recharge date and the initial or signature of the person who performs this service.
6. A Competent Person will perform inspection and maintenance of all fire fighting equipment. The following general guidelines will be observed:
 - a. Portable fire extinguishers shall be inspected at regular intervals, not more than one year apart, extinguishers shall be thoroughly examined and/or recharged or repaired to ensure operability and safety or replaced as needed. Each extinguisher shall have a durable tag securely attached to show the maintenance or recharge date and the initial or signature of the person performing the service.
 - b. Fire extinguisher hose nozzles should be kept free of obstruction at all times.
 - c. In areas where insects tend to nest in protected small areas, the nozzle should be covered with small cloth or plastic bag to keep it free of obstructions, but not to impede the operation of the extinguisher.
 - d. A fire extinguisher that is empty, defective, or has been discharged should be removed from service a red (out of service) tag attached and be replaced by a Competent Person or recharged by a qualified service company.
7. Due diligence must be used in keeping sprinkler systems in good operating condition.
8. All flammable liquids/solvents should be kept in approved, properly labeled containers.
9. Small quantities of flammable liquids such as gasoline and solvents should be handled, transported, dispensed and stored in approved, marked safety cans. Safety cans have

self-closing caps, flame arrestors, and pressure relief vents. The contents must be properly labeled.

10. Although it is not an OSHA requirement, it is recommended by the NFPA to follow a color code for fuel cans. The color coding is:
 - a. Gasoline cans are red
 - b. Diesel fuel cans are Yellow
 - c. Kerosene cans are blue

Safety Cans

1. Cans of oil, kerosene, oily rags, waste, etc., must not be allowed near sources of ignition, such as fires, flames and/or sparks.
2. Gasoline, kerosene, or other flammable liquids must not be stored in glass containers.
3. Do not store flammable liquids in open containers.
4. Flammable and combustible materials such as oil or gasoline soaked rags/clothing; oily waste and shavings must not be left lying around or piled on the ground. Spontaneous combustion is likely to result and cause a fire. These materials must be stored in approved and covered metal containers. These containers should have lids, and should be emptied daily to maintain the premises in a safe and sanitary condition.
5. Because of their convenient size, aerosol cans are often stored or set down in unsafe places. Keep in mind that all aerosol cans are pressurized and that this pressure increases when exposed to heat. If the can is overheated, it can violently explode sending projectiles and flames into the surrounding atmosphere. Aerosol spray cans containing various commodities are typically labeled as flammable. If the product isn't flammable, the propellant usually is. Do not store pressurized aerosol flammable cans in non-approved storage containers. Do not store aerosol cans in areas where the manufacturer's recommended storage temperature is exceeded.
6. Storage cabinets, rooms or particular areas should be designated and approved to store flammable liquids. The Competent Person is to determine the approved method to store flammables.
7. Not more than sixty (60) gallons of flammable, or one hundred twenty (120) gallons of combustible liquid shall be stored in any one (1) storage cabinet or container and the total gallons shall not exceed the cabinet rating.
8. No more than twenty-five (25) gallons of flammable liquids shall be stored outside an approved storage cabinet, unless a designated area has been provided which meets all regulatory requirements.

9. Dispensing drums should be equipped with special self-closing faucets and pressure vacuum relief vents. Also, a bonding wire should be attached to the tank and be made available for attachment to the receiving container.
10. Flammable liquids should be stored well away from the immediate work area.
11. Outside portable tank storage shall be located no closer than twenty-five (25) feet from any building.
12. Fire fighting equipment is for fire use only and shall be kept in its designated place at all times when not in use.
13. All fire protection equipment must be located in designated areas that are clearly identified with appropriate markings. This equipment should be located in the vicinity of likely fire hazards, but it must be accessible to operating personnel. The number, type, and location of extinguishers must meet all applicable standards.

Fire Prevention Procedures

1. All fires shall be reported to any site supervision immediately. Your immediate supervisor may not be available at the time, but a supervisor from another crew and/or company is available and would have the ability to summon assistance via a cell phone and/or radio.
2. The prevention of fires is of utmost importance. Good housekeeping and equipment maintenance must be followed to keep fire hazards at a minimum.
3. Good housekeeping should be maintained at all work locations and in all vehicles.
4. Paper and other combustible materials should not be allowed to accumulate.
5. Matches, cigarette lighters or any other source of ignition should not be carried into any area where a flammable atmosphere may be present.
6. Smoking must be confined to areas specifically designated and far away from any flammable substance storage and/or use.
7. Smoking is not permitted in the immediate vicinity of batteries, oil, and gasoline storage or in any area suspected or known to contain flammable substances, regardless of whether or not a "no smoking" sign is displayed. Any area subject to contamination by flammable substances should be designated as a "no smoking area," and a sign to that effect should be displayed.

8. Before a source of ignition (such as a welding torch) is carried into a closed building or tank, a test should be made to detect the presence of a combustible atmosphere using an approved method.
9. The use of gasoline as a cleaning agent is strictly forbidden.
10. Oil or gasoline from leaks should be cleaned up and disposed of in a prescribed manner.
11. All leaks should be reported and repaired immediately. If immediate repair is not possible, adequate warning signs must be posted and extra precaution against fires instituted.
12. In the event of a gas leak, all sources of ignition should be eliminated immediately.
13. When testing for gas leaks, use soap suds or approved leak detector fluid. Never use an open flame.
14. Since paint, insect sprays and most paint removers are usually flammable; their use near open flames or other sources of ignition must be avoided. Read the labels on the containers.
15. Extinguishers shall be located where they will be readily accessible, easily seen and immediately available for use. They shall be located along normal paths of travel and where needed.
16. Extinguishers having a gross weight not exceeding forty (40) pounds should be installed so that the top of the extinguisher is not more than five (5) feet above the floor. Extinguishers having a gross weight greater than forty (40) pounds should be installed so the top of the extinguisher is not more than three and a half (3-1/2) feet above the floor.
17. The selection of fire extinguishers for a given situation will depend upon the characteristics of the fires anticipated, the construction of the individual property, acceptance by the owner, the vehicle or hazard to be protected, ambient-temperature conditions, and other factors.
18. During the construction phase of the construction facilities, the support buildings, or permanent plant buildings or facilities, the construction area shall be provided with one portable hand fire extinguisher, multi-purpose, cartridge operated, with a minimum rating of 2-A (two pounds, type A) for each three thousand (3,000) square feet of area of building construction site with a maximum travel distance to an extinguisher of one hundred (100) feet.
19. One or more fire extinguishers rated not less than 2-A (two pounds, type A) shall be provided on each floor. It is usually the responsibility of the Superintendent to provide

and maintain the proper quantity and type of fire extinguisher in the general areas. It is the responsibility of the Competent Person to check to see if the general work area is covered properly, report insufficient coverage to the Superintendent and provide the proper type, size and quantity of fire extinguishers for special conditions warranted by our work.

20. Other areas such as remote fueling areas, electrical power distribution centers, engine sets and fuel-fired heaters may require additional extinguishers.
21. Access to all available fire fighting equipment must be maintained at all times.
22. Fire fighting equipment must be conspicuously located.
23. A 10-B rated fire extinguisher shall be provided within fifty (50) feet when over five (5) gallons of flammable or combustible liquids or five (5) pounds of flammable gases are being used.

In The Event of a Fire

1. Evacuate all personnel to a predetermined designated area.
2. Assign an employee to contact the Project Superintendent and Brookstone, L.P. Safety Director.
3. Assess the type and magnitude of the fire.
4. Use prudent judgment.
 - a. Minor small controllable fires...extinguish with appropriate type of fire extinguisher. Assess the damage and report to your supervisor.
 - b. Severe uncontrollable fires...evacuates area and call the local fire department, account for all employees evacuated to the designated assembly point, assist the fire department if requested and report to your supervisor.
5. Verify area is safe then return employees to their work area and resume installations.

Ignition Hazards

1. Operations which constitute a fire hazard need signs posted. The sign should read: **"NO SMOKING OR OPEN FLAME."**
2. Only low voltage or battery powered lighting is approved when temporary lighting is needed in close proximity and/or around flammable storage, handling and/or dispensing.

3. No temporary building used to store flammable materials shall be erected where it will block an exit or means to an exit and must be twenty (20) feet clear of other buildings.
4. When storing flammables in a storeroom located within another building or structure, only non-combustible material or material with a one (1) hour fire rating may be used for the construction of that storeroom.
5. Storage cabinets, storerooms and designated areas used for the storage of flammable substances must be located no less than fifty (50) feet from any source of ignition.
6. In open yard storage areas, combustible materials are stacked with due regards to the stability of stacks and in no case higher than twenty (20) feet.
7. Driveways between and around combustible materials storage stacks shall be at least fifteen (15) feet wide.
8. Portable fire extinguishers rated not less than 2-A (two pounds, type A) must be placed so that maximum travel distance to the nearest unit will not exceed one hundred (100) feet. The layout of an area could require additional fire extinguishers, even though the total area does not exceed three thousand (3,000) feet (see examples below).

Classes of Fires

1. **Class "A"** fires occur in ordinary materials such as wood, paper, rags, and rubbish. The quenching and cooling effects of water or fire extinguisher solutions containing large percentages of water are of first importance in extinguishing these fires.
2. **Class "B"** fires occur in the vapor-air mixture over the surface of flammable liquids such as gasoline, oil, grease, paints and thinners. The limiting of air is of primary importance. Generally, regular dry chemical, multi-purpose dry chemical, carbon dioxide, and foam may be used depending on the circumstances of the fire. Solid streams of water are likely to spread the fire.
3. **Class "C"** fires occur in or near electrical equipment where non-conducting extinguishing agents shall be used. Dry chemical, carbon dioxide, compressed gas, or vaporizing liquid may be used. Foam or a solid stream of water should not be used because both are good conductors and can expose the operator to a severe shock hazard.
4. **Class "D"** fires occur in combustible metals such as magnesium, titanium, zirconium, lithium and sodium. Specialized techniques, extinguishing agents, and extinguishing equipment are needed to control and extinguish fires of this type. Normal extinguishing agents generally should not be used as there is a danger in most cases of increasing intensity of the fire because of a chemical reaction between some extinguishing agents and the burning metal.

Extinguisher Types

1. **For use on Class A fires**
 - a. Water
 - b. Stored pressure, cartridge operated, water pump tank
 - c. Soda Acid
 - d. Dry Chemical
 - e. Foam

2. **For use on Class A and B fires**
 - a. Foam
 - b. Dry chemical - sodium or potassium bicarbonate cartridge or stored pressure.
(Will control small surface fires)

3. **For use on Class B and C fires**
 - a. Carbon dioxide (will control small Class A fire)
 - b. Dry Chemical

4. **For use on A, B and C Fires**
 - a. Dry chemical - multi-purpose A B C cartridge or stored pressure

5. **For use on Class D fires**
 - a. Special purpose Dry Powder.

Flammable Liquids (Flash Point 100°F or less)

1. Flammable liquids such as gasoline, benzene, naphtha, and lacquer thinner must not be used for cleaning purposes.

2. Spills or overflow of flammable liquids should be avoided. However, in the event of spillage, immediate steps should be taken to clean up and minimize the danger of fire.

3. When liquids such as condensates, gasoline, and some crude oils are drawn into open metal containers, the open container must be bonded by means of either threaded connections or a bonding wire to the vessel or piping in order to prevent any possible ignition source from generation of static electricity.

4. With exceptions of gasoline and oil, the mixing of two or more flammable liquids is prohibited.

5. When pumping highly flammable liquids from one container to another, metallic contact should always be maintained between the two containers or be bonded together.

Safe Handling of Flammable & Combustible Materials

1. Never handle a flammable substance near a source of ignition or bring a source of ignition near a flammable substance.
2. Safe transfers of flammable liquids are made in an open, well ventilated area where the vapors will be diluted and dissipated by large quantities of fresh air. Make sure you have a bond between containers to eliminate static electricity.
3. Using funnels and spouted cans makes for a quick transfer and helps prevent dangerous spills.
4. Flammable and combustible liquid spills should be cleaned up immediately.
5. When refueling or lubricating machinery, be certain that it is shut down first. Pieces of machinery like exhaust pipes and bearings radiate heat, and electrical systems generate sparks that can ignite in an accidental spill.
6. Be certain that an engine is supplied with the proper type of fuel and the fuel supply is shut off by a valve when the engine is not in use.
7. Never use gasoline as a solvent - it produces dangerous amounts of vapor. Always use a high flashpoint solvent or thinner for cleaning off paint, grease, or oil around equipment.
8. To eliminate the build-up of static electricity on fuel cans being transported, unload the fuel cans onto the ground first then pick up cans and dispense the fuel. This helps to discharge the possible build-up of static electricity on the cans and is less likely to draw a static arc (source of ignition) from the can to the fuel tank causing a possible fire.
9. If fuel is dispensed from a fuel truck, the truck should be bonded to equipment being filled. If fuel is dispensed from a fixed fuel tank, the tank should be bonded to the fuel can before the fuel is dispensed (see below). The bonding between the tank and can will reduce the risk of igniting the fuel due to static electricity discharge which could be a source of ignition.

Proper Use of Fire Fighting Equipment

1. Always use the handle to carry an extinguisher. Walk at a rapid pace do not run to a fire.
2. Proceed to the upwind side of a fire. Stay well clear of the flames and fumes. When you are approximately ten (10) feet upwind of the near edge, stop and ready your extinguisher for discharge.

3. Once your extinguisher is set for discharge, position yourself within eight feet of the near edge upwind of the fire. From this position, the air currents help carry the agent into the fire assuring maximum visibility and providing protection from the heat.
4. When discharging the extinguishing agent, aim your stream just short of the near edge at the base of the fire.
5. Apply the agent in a side-to-side sweeping action across the full width of the fire. Make sure each sweep of the extinguishing agent is slightly wider than the near or leading edge of fire.
6. Advance forward only as fast as the extinguishing action of your agent will permit. Do not outrun your protection. Do not raise your stream to chase the flame. Keep it down in front of the flame edge.
7. Stop short of the already extinguished fuel area. Do not become involved in the fire. Above all, maintain your side-to-side sweeping action until the fire is extinguished. Once the fire is out, stand by for a few minutes. Make sure there is no danger of a re-flash. Do not ever turn your back on an apparently extinguished fire.
8. Once your fire extinguisher is out of agent you must evacuate the area and report to your supervisor. If the fire is not out when your extinguisher is empty, it is possible for the fire to re-spread around you and trap you.

Cutting and Welding “Hot Work” Protocol

1. The first option is to choose another alternative to hot work.
2. If you must conduct a hot work activity, use good judgment to limit the risk of fire.
3. Strict enforcement of all precautions referred to in this section is required regardless of the size of the job or time involved.
4. Inspect hot work equipment to ensure it is in good repair. Remove damaged or defective equipment from the work area.
5. Make sure extinguishers are of the correct type and size and are nearby and fully functional.
6. Employees required to conduct hot work permit activities must be properly trained prior to task assignment.
7. Clear area (around the area of hot work) of all combustibles.

8. A fire watch is required throughout the entire job. The fire watch will look for stray sparks and ignition or other fire hazards.

STEEL ERECTION

NOTE: As of January 18, 2001, the OSHA standards in Subpart R have been revised. Please be sure to refer and comply with this standard when performing any Steel Erection Operation on any Brookstone, L.P. Project.

1. The derrick or erection floors shall be solidly planked or decked over its entire surface except for access openings. Planking of not less than two (2) inches thick full size undressed, or decking of equivalent strength shall be used, and shall be laid tight and secured to prevent movement.
2. A temporary floor shall be maintained within two stories or twenty-five (25) feet, whichever is less, below and directly under the erection floor and that portion of each tier of beams on which bolting, riveting, welding or painting is being done.
3. During the final placing of solid web structural members, the load shall not be released from the hoisting line until the members are secured with not less than two (2) bolts at each connection and drawn up wrench tight.
4. If specified in the plans, bar joists shall not be placed on any structural steel framework unless such framework is safely bolted or welded.
5. In steel framing where bar joists are used and columns are not framed in at least two (2) directions with structural steel members, a bar joist shall first be field bolted at the columns to provide lateral stability during erection.
6. Tag lines shall be used for controlling hoisted loads of structural members during steel erection.
7. **100% Fall Protection is required above six (6) feet.**

CONFINED SPACE ENTRY

Every employee shall be properly trained to recognize a confined space hazard. Specific employees who will become the Competent Person shall be properly trained to transform a confined space into a safe work environment. Specific employees who will become the entrant will be properly trained to enter a confined space, once it is made safe.

Key Definitions

1. **Competent Person:** One who is capable of identifying existing and predictable hazards in the surroundings or work conditions which are hazardous or dangerous to employees and who is authorized to take prompt corrective measures to eliminate the hazards or remove the employee from the hazardous condition.
2. **Attendant:** A specially trained individual stationed outside of a confined space who monitors the authorized entrants inside.
3. **Entrant:** An authorized person who enters a confined space.
4. **Entry Supervisor:** A person who is responsible for determining if acceptable conditions are present to enter a confined space.
5. **Stand-by Attendant:** When required, a specially trained individual stationed outside of a confined space who will monitor the authorized entrants.
6. **Stand-by Entrant:** When required, an authorized person who enters a confined space.

Confined Space Entry Policy

1. All employees required to work in a confined space operation must receive specific training and protective equipment prior to entry.
2. A confined space entry Job Hazard Analysis will be completed, which will communicate and document the specific hazards to all involved employees.
3. Some examples of confined spaces are:
 - a. Tanks and pipelines.
 - b. Manholes and trenches.
 - c. Building crawl spaces.
 - d. Mechanical chases.
4. The Competent Person will evaluate the space for potential and existing hazards.

5. Signs will be posted and the entry barricaded to limit access to the confined space.
6. When required erect the non-entry rescue system.
7. The atmosphere in and around the space must be tested for oxygen content, toxic and flammable gases before entry.
8. Proper personal protective equipment must be identified before entry.
9. All required tools and equipment to be used in the confined space must be identified and checked out before entering a confined space.
10. The method of communication to be used must be established before entering a confined space.
11. A confined space checklist must be completed before entry.
12. Unless verified all confined space is to be considered having a toxic atmosphere.

Training (General)

1. Training must be completed before any confined space duties are assigned.
2. When a change in the work presents a new hazard, all employees will require retraining.
3. Retraining must be provided whenever there are deviations from the confined space entry procedures.
4. Retraining will be required if a lack of proficiency is observed or new procedures or equipment are introduced.

Training (Specific)

1. Competent Person will be specifically trained in the following:
 - a. Recognition of hazards.
 - b. Hazard elimination.
 - c. Implementing a Job Hazard Analysis.
 - d. Atmospheric testing.
 - e. Erecting signs and barricades.
 - f. Ventilation equipment and procedures.
 - g. Selection and the use of personal protection equipment.
 - h. Employee retraining.
 - i. Training Attendants.
 - j. Training Entrants.

- k. Training Supervisors.
 - l. Site-specific duties and responsibilities.
2. Attendant will be specifically trained in the following:
 - a. Recognition of hazards.
 - b. Constant monitoring of the work area.
 - c. Summoning rescue help.
 - d. Identifying changing work conditions.
 - e. Site specific duties and responsibilities.
 3. Entrants will be specifically trained in the following:
 - a. Recognition of hazards.
 - b. Site-specific personal protection equipment.
 - c. Rescue procedures.
 - d. Identifying changing work conditions.
 - e. Site specific duties and responsibilities.
 4. Entry Supervisor will be specifically trained in the following:
 - a. Recognition of hazards.
 - b. Checking all personal protection equipment, Job Hazard Analysis, and personnel are in place.
 - c. Coordinating with customer requirements.
 - d. Site specific duties and responsibilities.
 - e. Inspection and Storage
 5. The Competent Person must inspect all equipment used for confined space entry.
 6. Equipment that is defective or damaged shall be red tagged (danger do not use) and returned to the Safety Director.
 7. Damaged or defective equipment will be replaced before entry into the confined space.
 8. Confined space entry equipment shall be stored in a manner that will not adversely affect its integrity and in a location that is free of harmful agents.

Definitions

1. A confined space has the following characteristics:
 - a. Its size and shape allow a person to enter it.
 - b. It has limited openings for workers to enter and exit.
 - c. It is not designed for continuous human occupancy.
2. A permit required confined space has one or more of the following additional characteristics.
 - a. Contains or has the potential to contain a hazardous atmosphere.

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

Permit Required Confined Space Entry Procedures

1. The Entry Supervisor is responsible for coordinating and regulating the work assignments in a manner that will reduce hazards to personnel entering confined spaces.
2. Entry Supervisor of the personnel entering the confined space must properly complete a Confined Space Entry Permit.
3. When there is doubt as to whether or not a particular location requires a permit the Safety Director must be consulted.
4. No deviations from the Company confined space entry requirements specified in these instructions will be permitted.
5. For permit required spaces:
 - a. Complete the confined space entry permit.
 - b. Assign an entry attendant.
 - c. Verify that the means of summoning emergency personal and equipment is available for the entry attendant.
 - d. Verify that all requirements of the confined space entry permit are met.
 - e. Close-out the permit at the completion of the task assignment.
6. If a flammable atmosphere is present and lighting and power requirements cannot be met by the use of battery lights and pneumatic equipment, reduced voltage lighting equipment with a maximum of 12 volts must be used.
7. Unless verified all confined space is to be considered having a toxic atmosphere.

General Procedures

1. The executed Confined Space Entry Permit is valid only for one (1) shift, and for the specified work, location and time period indicated on the permit.
2. The Confined Space Entry Permit must be posted near the entry point of the confined space.

3. A secondary method of exit should be considered during the planning stage in order to execute a quick, safe exit, should an emergency situation arise during occupancy of the confined space.
4. If the confined space is equipped with a grounding cable, a firm mechanical joint should be verified.
5. All electrical power must have G.F.C.I. protection located outside the confined space.
6. All persons entering the confined space, stand-by attendants and back-up personnel must be instructed in the hazards involved, the precautions to take, the use of protective and emergency equipment and the use of rescue equipment.
7. At least one (1) Entry Attendant must be at each point being used to enter the confined space.
8. The Entry Attendant must have some reliable method of communication for summoning additional assistance.
9. The Entry Attendant's primary responsibility is to be attentive to the personnel inside the confined space.

Isolation Requirements

1. All energy sources such as pipelines, electrical services, agitators and any other services leading to the confined space must be isolated or made safe prior to personnel entering. Do this by means of the following:
 - a. Physically disconnected
 - b. Blanked off
 - c. Valved off
 - d. Locked and tagged

Confined Space Atmospheric Requirements

1. Review of the confined space and its previous contents must be made by the Client Representative or Entry Supervisor responsible for the work to ascertain that the necessary ventilation, protective clothing, respiratory equipment, emergency stand-by equipment and fire prevention precautions have been specified and provided.
2. If the confined space has previously been in use and is contaminated, cleaning and decontamination must be performed prior to personnel entering.
3. Appropriate tests of the atmosphere must be made before entering the confined space. In all cases an oxygen and flammability test will be performed. The test results will be

recorded on the Confined Space Entry Permit by the person performing the test, who will initial the permit. The atmosphere inside the confined space must meet the following conditions:

- a. Oxygen (O₂): Atmospheric oxygen content must be between 19.5% and 23.5%.
 - b. Flammables: Flammable gases and vapors must be less than 10% lower explosion limit (LEL) by volume.
 - c. Toxic contaminants: Must be verified and below the permissible exposure level.
4. If work being performed inside the confined space could generate any toxic or flammable vapors or produce any oxygen deficient atmosphere, testing must be done continuously while work is being performed.
 5. Atmosphere testing can only be conducted by an employee who has successfully completed gas detector training for the monitor being used.
 6. If the atmosphere within the confined space cannot be maintained within the allowable ranges for oxygen content, toxicity levels and flammable limits (as defined above), employees must not enter.

Burning and Welding

1. Burning and welding in confined space entails unusual hazards and a detailed analysis, using the Job Hazard Analysis, must be made of each specific case to insure safe performance of the work.
2. When burning, welding or heating operations are required in a confined space, either a mechanical method of ventilation (such as a blower) or local exhaust ventilation method (such as an exhaust hood) must be provided to ensure adequate ventilation.
3. When sufficient ventilation cannot be obtained without blocking the means of access to the confined space, employees in the confined space must be protected by air supplied respiratory equipment.
4. When burning or welding is required in any confined space, the gas cylinders and welding machines must be located outside the confined space.
5. Hose connections shall be checked for leakage prior to entry into confined spaces.
6. Hoses shall be removed from the confined space at the end of work, during lunch periods, breaks or whenever all personnel leave the confined space.
7. Vessels and/or tanks of laminated shell construction should be given special consideration for the possibility of trapped residuals from the previous contents.

Emergency Alarms

1. The Confined Space Entry Permit will be automatically canceled in the event that a major alarm, gas/vapor release, area fire alarm, or plant emergency is sounded, with the exception of a test alarm. When the all-clear signal is sounded, the Confined Space Entry Permit can be reinstated or reissued after atmospheric tests are retaken and noted on the permit.
2. If the alarm is sounded, personnel inside the confined space must exit and follow the site-specific emergency evacuation procedures.

Atmosphere Testing

1. Calibrate air-testing equipment according to manufacturer's specifications.
2. Perform a function test of the equipment. Function tests do not replace calibration.
 - a. Blow into oxygen sensors to test for oxygen deficiency.
 - b. Use a known gas concentration to check the combustible gas sensor.
3. Prior to allowing employee to enter the space, test the air in the space to determine if it is safe to enter by measuring the oxygen level, flammability, and toxicity.
 - a. Air that contains too little oxygen is known as oxygen-deficient. Breathing such air can cause loss of coordination, fatigue, vomiting, unconsciousness and death.
 - b. Air that has too much oxygen is known as oxygen-enriched. This is a serious fire hazard.
 - c. The atmosphere can contain a high concentration of flammable materials, which can cause the air to burst into flame or explode.
 - d. The air can contain toxic materials, which can kill you fast or slow.
4. Conduct pre-entry testing from outside the space, taking samples through a pick hole, or through a slightly opened cover on the downwind side of the space.
5. If ventilation is being used, turn the system off for your first tests. Then turn it back on and retest the air.
6. Test all vertical levels of the space – top, middle, and bottom.
7. Test as much of the space's horizontal area as you can reach.
8. If any test shows the air to be unsafe, the hazard must be controlled before anyone enters the space.
9. Periodically monitor or continue testing to make sure the air is safe.

10. Continuously monitor air quality if the task in the confined space involves scraping, scaling, using solvents, or hot-work. Such monitoring must be done within the workers breathing zones.

Ventilation

1. Ventilate a confined space whenever its atmosphere is hazardous in any of these ways:
 - a. The air contains too little oxygen
 - b. It contains too much oxygen
 - c. The atmosphere is flammable
 - d. The atmosphere is toxic
2. Begin ventilating far enough in advance so that the air will be safe before anyone enters the space. Conduct testing to determine the success of the ventilation effort.
3. Continue ventilating as long as a worker is in the space.
4. Keep the exhaust intake close to the work area.
5. Use local exhaust ventilation to control flammable and toxic materials produced at a single point.
6. Use general ventilation; also known as dilution ventilation, when contaminants are widely dispersed. This type of ventilation flushes the atmosphere by supplying and exhausting a large volume of air.
7. Use exhaust ventilation when the atmosphere could be flammable or toxic.

Confined Space Rescue

1. The Competent Person must develop a site specific confined space rescue plan. Such a plan must be explained to all confined space entry participants. The plan must address the requirements in this section.
2. The rescue team must be established prior to the entry and the Entry Supervisor must verify that rescue services are available and that the means for summoning them are operable.
3. If an onsite Rescue Team is used, the Entry Supervisor must assure that each member of the Rescue Team is provided with and trained to use the personal protective equipment and rescue equipment necessary for making rescues from permit spaces.
4. Members of the Rescue Team must also be trained in basic first-aid and CPR and will assist during any medical emergencies during confined space entries.

-
5. To facilitate non-entry rescue, retrieval systems or methods must be used whenever an authorized entrant enters a permit space, unless the retrieval equipment would increase the overall risk of entry or would not contribute to the rescue of the entrant. Retrieval systems shall meet the following requirements:
 - a. Each authorized entrant will use a chest or full body harness, with a retrieval line attached at the center of the entrant's back near shoulder level, or above the entrant's head. Wristlets may be used in lieu of the chest or full body harness if the Entry Supervisor can demonstrate that the use of a chest or full body harness is unfeasible or creates a greater hazard and that the use of wristlets is the safest and most effective alternative.
 - b. The other end of the retrieval line will be attached to a mechanical retrieval device or fixed point outside the permit space in such a manner that rescue can begin as soon as the rescuer becomes aware that rescue is necessary. A mechanical retrieval device will be available to retrieve personnel from vertical type permit spaces more than five (5) feet deep.

Personal Protective Equipment (PPE)

Policy Statement

Prior to starting work, each work location and each work task will be assessed to determine if hazards are present, or likely to be present, that could be capable of causing harm to employees.

Employee Classification

1. Safety trained: An employee trained by a Competent Person to recognize the hazards associated with personal protective equipment.

Personal Protective Equipment Policy

1. Personal Protective Equipment is never the first option for the elimination of a potential hazard.
2. Personal Protective Equipment is never an absolute assurance of protection against hazards.
3. Personal Protective Equipment shall be used in conjunction with other efforts to eliminate hazards such as engineering controls, guards, and safe work practices.
4. The Safety Director must approve all Personal Protective Equipment.
5. All Employees:
 - a. Must wear a hard-hat, approved safety glasses and sturdy hard-soled, footwear at all times in work areas unless otherwise communicated or posted.
 - b. Must be trained in the proper use, storage and sanitary maintenance of any Personal Protective Equipment issued by the supervisor prior to use by the employee.
 - c. Must report for work wearing clothes that are in good repair and appropriate for the task assigned. Long pants extending completely below the calf, but not dragging on the ground. Pants size should be in proportion with body size and waist of pants worn at the waist line. Tee shirts with two (2) inch sleeves at a minimum are mandatory. Frayed clothing or clothes with holes will not be allowed on site.
 - d. Jewelry is prohibited in work areas.
 - e. Must use required Personal Protective Equipment.
 - f. Must be provided appropriate protection against falls of six (6) feet or more.

- g. Must wear gloves when handling rough or sharp-edged or abrasive materials or exposed to conditions that could expose employee to potential laceration hazards.

Training

Employee training on assigned Personal Protective Equipment is required as a part of initial orientation and whenever new Personal Protective Equipment is assigned to them. Employees will be trained on:

1. When to use the equipment.
2. How to use the equipment.
3. Limitations of the equipment.
4. Proper care, maintenance, useful life, and disposal of the equipment the employee must demonstrate their understanding of this training prior to being allowed to use the equipment. As with all training provided by the Company, the Personal Protective Equipment training must be documented.

Inspection and Storage

1. Employees are required to inspect all Personal Protective Equipment prior to use. When inspecting the Personal Protective Equipment look for:
 - a. Damage
 - b. Cuts, cracks and/or abrasions
 - c. Scratches in the surface
 - d. Weathered components
 - e. Hardening or stiffening of pliable surfaces
 - f. Rips or tear spots
 - g. Deterioration due to age, chemical contact and/or heat exposure
2. Equipment that is defective or damaged shall not be used, and immediately replaced.
3. Personal Protective Equipment shall be stored in a manner that will not adversely affect its integrity.
4. Personal Protective Equipment must be stored in a location that is free of harmful agents, such as chemical, particulate, sunlight, temperature extremes, excessive moisture, or physical agents, such as sharp objects.

Head Protection

1. All employees must wear head protection at all times while in the work area. The Safety Director may only issue exceptions to this requirement.
2. Employees may wear only head protection approved by the Safety Director.
3. Hard hats must be worn in conjunction with welding hoods.
 - a. Soft hoods are not permitted.
4. No employee is permitted to:
 - a. Wear hard-hats backwards.
 - b. Drill holes in the shell of the hard hat.
 - c. Alter the shape of the hat or bill.
 - d. Remove the suspension straps or cut/alter them in any way.
 - e. Paint hard hats.
 - f. Cover the hard hat with stick on labels to the point where a thorough inspection of the hard hat is difficult.
5. Exceptionally long scalp hair may pose a hazard of getting caught in equipment, or entangled and pulled into rotating equipment. All long hair must be tucked away or underneath the hard hat. Furthermore, long scalp hair must not interfere with the proper fitting of the hard hat.
6. Do not wear baseball caps under the hard hat.
7. Employees are required to inspect head protection prior to use to ensure the equipment is in safe condition. Equipment that is defective or damaged is not to be used. Inspect the head protection for:
 - a. Dents
 - b. Cracks
 - c. Suspension connector cracks
 - d. Torn, loose or worn suspension straps
 - e. Cleanliness/sanitation

Hearing Protection

1. Operators of heavy equipment must use approved hearing protection at all times while operating such equipment.
2. All employees must wear hearing protection at all times when the sound levels in the work area exceed those shown in the following table:

Sound Pressure Level (dB)	Exposure Duration Hours
85	8
92	6
95	4
97	3
100	2
102	1.5
105	1
110	0.5
115	0.25

3. The Company will make a variety of hearing protection available to the employees. However, employees may wear only hearing protection approved by the Safety Director. Approved hearing protection will include:
 - a. Ear plugs
 - b. Headband plugs
 - c. Ear muffs

4. Employees are required to inspect hearing protection prior to use to ensure the equipment is in safe condition. Equipment that is defective or damaged or does not pass inspection is not to be used.

5. Inspect hearing protection for: Ear plugs, disposable & reusable.
 - a. Softness
 - b. Discoloration
 - c. Cleanliness

6. Ear muffs
 - a. Check cushions – wash as needed
 - b. Cracks in cushions or shell
 - c. Check for proper fit – loose muffs offer no protection

Foot Protection

1. Employees must wear protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, and where such employee’s feet are exposed to electrical hazards.

2. Only hard toe footwear shall be allowed on job-sites. Sneakers, sandals or shoes that have been slit or have holes cut in them are prohibited.

3. All hard toe footwear, except rubber boots, shall be made of leather and have a defined heel. The defined heel must be an original design by the manufacturer.

4. Sneakers and other hard toe footwear designs which comply with ANSI Z-41-1991 standards, but not those stated above will not be allowed on projects.
5. Special purpose footwear (i.e., crush resistant, chemical resistant, puncture resistant and di-electric footwear) shall be selected and used to provide protection to employees from these identified hazards, refer to MSDS.
6. Employees who perform tasks which expose them to potential foot/leg injury hazards (using jackhammer, ground tamper, etc.) shall wear additional foot/leg protection, such as metatarsal and shin guards.

Hand Protection

1. Employees are required to use appropriate hand protection when hands are exposed to identified hazards such as: cuts, abrasions and punctures; thermal burns and harmful temperature extremes; chemical burns, irritation or exposure to harmful substances; and vibration or repetitive motion hazards.
2. Selection Guidelines for Hand Protection
 - a. There is no one glove that can provide protection against all potential hand hazards. It is important to select the most appropriate glove for a specific application and to determine how long it can be worn and whether it can be reused.
 - b. Performance characteristics of specific gloves can be obtained from glove manufacturer documentation. As long as performance characteristics are acceptable, it may be more cost effective to regularly change less expensive gloves rather than to re-use more expensive types of gloves. Other factors which may affect glove selections, include:
 - i. Fit (Sizes)
 - ii. Dexterity needed (Thicker gloves may prevent using hands/fingers fully)
 - iii. Duration of use anticipated
 - iv. Frequency of use
 - v. Degree of exposure to the hazard
 - vi. Durability of the glove for the task at hand
 - vii. Cost
 - c. Chemical properties such as toxins, corrosives or irritants, as well as local affects (area contacted) or systemic effects (absorbed through skin) must be determined prior to selecting gloves. The corresponding material safety data sheet (MSDS) can provide this information and possibly additional guidance for hand protection and other Personal Protective Equipment.
 - d. If gloves are worn for chemical protection, requirements for proper disposal must be established and communicated to affected employees.

3. Repetitive motion hazards
 - a. Avoid wearing watches, bracelets, or tight clothing that hampers wrist circulation. Grasp objects with the whole hand if possible. Look for tools and keyboards designed to ease strain on the hand and wrists. Anti-vibration gloves, palm pads, and glove inserts are available for use with for use with jack hammers, chain saws ground tampers, etc.

Respiratory Protection

1. If you find yourself in a situation where a respirator is required, notify the Safety Director before purchasing or issuing such Personal Protective Equipment. This includes filtering face piece (dust masks). See Respiratory Protection section for additional information.

The following are conditions that have been established to make determination of when to wear or not wear a respirator.

1. Drilling overhead
2. Dry concrete sawing will require the use of a respirator.
 - a. Wet sawing of concrete will not require the use of a respirator. Wet sawing is the only concrete cutting procedure that should be considered.
3. Concrete grinding will require the use of a respirator. This will include any other trade grinding in the same room as Company employees.
4. Any chemical exposure.
5. Heavy sweeping around an employee, that which could raise a dense cloud for longer than thirty (30) minutes, will require the employee to leave the area. USE OF SWEEPING COMPOUND BY THE SWEEPER SHOULD ELIMINATE THE PROBLEM OF DUST.
6. Painting
 - a. All employees must monitor the type of paint product being used and avoid the area if possible. If you cannot avoid the area, request a MSDS for the product from the painting contractor. This will give you the information needed to determine if the product could create a hazardous atmosphere. In any situation that you are not sure of, call the safety department and get guidance.
7. All training of respirators will be by the Safety Director or approved vendor.

Fall Protection

A Competent Person will evaluate the work site and conditions and select the appropriate fall protection system.

1. Employees will be provided appropriate protection against falls of six (6) feet or more.

Practical Examples in Fall Protection

1. Use of ladders can sometimes lead to situations where you must tie off or use another method to avoid a fall hazard.
 - a. Any time you are working off a ladder and within ten (10) feet of a guardrail or other hazard, you must use fall protection.
2. Any deviation must be approved by the Safety Director.

EYE AND FACE PROTECTION

Employees must wear Company approved eye protection at all times while on a job-site or in a work area. Refer to the attached *EYE AND FACE PROTECTION SELECTION GUIDE* and the *FILTER LENSES FOR PROTECTION AGAINST LIGHT RADIATION* information sheet.

1. Prescription eyewear will be allowed only if it meets the basic Company eye protection requirements.
 - a. Prescription eyewear that does not meet the basic eye protection requirements will be allowed only if equivalent eye protection is worn over their prescription lenses (i.e. ANSI Z-87.1 glasses or goggles).
2. Employees may wear contact lens on job-sites in conjunction with basic or required eye protection.
3. Soft and gas permeable contact lens are currently allowed to be worn with respiratory protection.
4. Goggles should not be worn over basic eye protection. However, goggles may be worn in conjunction with a face-shield.
5. Approved impact-type goggles must be worn to ensure greater eye protection from flying particles. Tasks which may dictate the need for impact goggles include:
 - a. Chipping
 - b. Power Sawing
 - c. Scraping
 - d. Hammering
 - e. Buffing
 - f. Grinding
 - g. Blowing
 - h. Pneumatic Tool Use
6. A face shield that complies with ANSI Z-87.1 1989 must be worn to provide face protection to the employee from flying particles, splashes, or mist.
 - a. A face shield provides only protection to the face and eyes from direct impact objects. Additional eye protection must be worn in conjunction with a face shield.
7. Burning goggles shall be worn when an oxy-fuel torch is used for cutting or burning.
8. A welding hood with a filtered lens of Number 10 shade or darker must be used to provide protection from injurious light radiation's produced during electric arc welding.

- a. Approved safety glasses with side shields and hard hats shall be worn in conjunction with the welding hood to ensure protection from popping hot slag when the hood is raised and overhead work exposures.
- b. Pipe liner hoods (pancakes) are strictly forbidden.

EYE AND FACE PROTECTION SELECTION GUIDE

1. Care should be taken to recognize the possibility of multiple and simultaneous exposure to a variety of hazards. Adequate protection against the highest level of each of the hazards should be provided. Protective devices do not provide unlimited protection.
2. Operations involving heat may also involve light radiation. As required by the standard, protection from both hazards must be provided.
3. Face shields should only be worn over primary eye protection (spectacles or goggles).
4. As required by the standard, filter lenses must meet the requirements for shade designations in 1910.133 (a)(5). Tinted and shaded lenses are not filter lenses unless they are marked or identified as such.
5. As required by the standard, persons whose vision requires the use of prescription (Rx) lenses must wear either protective devices fitted with prescription (Rx) lenses or protective devices designed to be worn over prescription (Rx) eyewear.
6. Wearers of contact lenses must also wear appropriate eye and face protection devices in a hazardous environment. It should be recognized that dusty and/or chemical environments might represent an additional hazard to contact lens wearers.
7. Caution should be exercised in the use of metal frame protective devices in electrical hazard areas.
8. Atmospheric conditions and the restricted ventilation of the protector can cause lenses to fog. Frequent cleansing may be necessary.
9. Welding helmets or face shields should be used only over primary eye protection (spectacles or goggles).
10. Non-side shield spectacles are available for frontal protection only, but are not acceptable eye protection for the sources and operations listed for "impact".
11. Ventilation should be adequate, but well protected from splash entry. Eye and face protection should be designed and used so that it provides both adequate ventilation and protects the wearer from splash entry.
12. Protection from light radiation is directly related to filter lens density.

ILLEGAL DRUGS, ALCOHOLIC BEVERAGES, FIREARMS & WEAPONS

It is Brookstone's policy to maintain a work environment that is healthy and safe for all employees and conducive to attaining a high quality and productive work standard. It is also our policy to prevent injuries to employees to eliminate losses of company property and to comply with provisions of the Texas Worker's Compensation Act. As part of this policy, the use, sale, or possession of narcotics, illegal drugs, including marijuana, related drug paraphernalia, "look-a-like" (simulated) drugs, intoxicants, alcoholic beverages, inhalants, firearms, or weapons while on duty in any company work location, or while on company business is prohibited. Written exceptions to this policy may be granted by the President depending on specific circumstances. Employees must not report for work while under the influence of any drug, intoxicant or other substance that will in any way adversely affect their working ability including their alertness, coordination, or safety. In addition, no illegal drugs, intoxicating beverages, firearms or weapons are allowed in vehicles, any offices or other work locations of the company. Illegal drugs include marijuana and all other drugs not prescribed by a licensed physician for use by the person possessing them. If any employee is using over-the-counter or prescription drugs that cause drowsiness or otherwise impair performance, it is the responsibility of that individual to inform company supervisory or management staff of this medication and its side effects.

Brookstone's drug policy includes a pre-employment drug screen, random drug testing of all employees at corporate discretion and post accident drug testing of all employees involved in and/or contributing to a job site accident, including near miss incidents.

All initial drug screens will be a ten (10) panel drug test with the standard limits then in effect for Brookstone's primary testing laboratory (currently, Occu-Care). If an initial drug test has a positive result, a re-test using the GC method will be performed.

Pre-Employment Drug Testing

A pre-employment drug screen will be required for all prospective permanent field employees. Achieving an acceptable result (negative) will be a condition of employment. If an applicant fails a pre-employment drug screen, that individual can re-apply after thirty (30) days.

Random Drug Testing

All Brookstone, L.P. employees will be subject to random drug testing on a quarterly basis. A number will be randomly selected and all employees having the last digit of their social security number matching the selected number will be tested.

When alcohol or drug use is suspected because of physical signs, unusual behavior or poor job performance, an employee must submit to "reasonable cause" drug testing. When testing for

"reasonable cause" the reasons for the testing must be documented, preferably by at least two (2) persons in supervisory positions.

A refusal to submit to drug testing or the inability to test negative within twenty-four (24) hours is considered grounds for immediate discharge.

Post-Accident Drug Testing

Post accident drug testing will be required of all employees involved in an accident or near miss incident. Involved means employees injured as well as employees who possibly participated in the accident cause. Employees involved in the incident will not return to work until results of the drug screen are known. A refusal to submit to drug testing or the inability to test negative within twenty-four (24) hours is considered grounds for immediate discharge.

Other Conditions Which Could Trigger a Drug Test/Search

If illegal drug usage on a job site is suspected, other measures such as the following will be necessary:

Entry into or upon any vehicle, office or other work location of the company is conditioned upon the company's right to search the personal effects for illegal drugs, including marijuana, related drug paraphernalia, "look-a-like" (simulated) drugs, intoxicants, alcoholic beverages, firearms, or weapons.

From time to time, and without prior warnings, searches by authorized company representatives may be made of anyone entering any vehicle, office or other work location of the company. Such searches may be made of the employees as well as employees of contractors or subcontractors who have business with the company.

When appropriate, such items discovered through these company searches may be confiscated and may be turned over to the proper law enforcement authorities.

Consequences of Violating this Drug, Alcoholic, and Firearms Policy

Violation of above policy will result in one of the following forms of corrective action: immediate discharge, suspension, probation, or written warning. In arriving at a decision for proper action, the seriousness of the infraction, the past record of the employee, and the circumstances surrounding the matter will all be taken into consideration.

Treatment Programs and Employee Insurance

While we do not sponsor or endorse any specific drug treatment programs, such programs are available through public and private health care facilities in our area. Affected employees are encouraged to seek assistance for themselves and their dependents. The group health insurance offered to eligible employees and their dependents provides limited coverage for expenses related to drug treatment programs. Refer to the plan description for details.

The Worker's Assistance Program of Texas (WAP/T) provides literature, consultation, and training about drug-free workplaces, drug testing, drug addiction, employee assistance programs, AIDS, and other work-related topics. Easy access to a statewide clearinghouse for drug-free workplace resources is provided free of charge. **Information is ordered by calling 1-800-522-0550; this toll-free number is available twenty-four (24) hours a day, seven (7) days a week. Or, you may visit their website at www.workersassistance.com.**

Workers Assistance Program of Texas is a private, non-profit organization and is one of the largest and most experienced providers of workplace human service programs in Texas.

Education and Training Programs

We do not offer, nor require participation in drug and alcohol abuse education and training programs. However, various public and private facilities in our area offer such programs and affected employees are encouraged to seek assistance. (See above section).

REGULATORY INSPECTIONS

General

The Occupational Safety and Health Act does permit OSHA to enter any workplace in America for the purpose of determining if violations exist. However, OSHA may only do so with the consent of the employer or by authority of a search warrant issued by a US District Judge or Magistrate. Inspections by OSHA Compliance Officers may be initiated for many reasons including employee complaints, serious or fatal accidents, special emphasis programs, or planned audits.

It is the policy of Brookstone, L.P. to comply with any inspection request, subject to the inspection policy established by/for a specific project. The regulatory inspection protocol contained herein applies to OSHA inspections, as well as other recognized safety and health agencies.

Inspection Procedure

The following procedure is the Company's standard practice, and must be adhered to in the event of an impending OSHA inspection.

1. When the Compliance Officer arrives at the project office or location to be inspected, he/she should be taken immediately to the General Contractor or the General Contractor's Site Safety Representative.
2. If we are the only contractor on the site, the Compliance Officer is to be taken to the Superintendent and/or Project Manager (if stationed at the site) and they will represent the construction site.
3. The Superintendent will inquire of the Compliance Officer as to the nature of his/her visit. The Compliance Officer is required to state the purpose of his/her visit (i.e., general compliance, special emphasis, Employee complaint, etc.). Upon determining the purpose of the visit, the Superintendent will notify all sub-subcontractors of the inspection and opening conference.
4. Superintendent is to notify the Safety Director as soon as he/she is aware the Compliance Officer is on the site.
5. The Superintendent will attend the opening conference and adheres to the following guidelines:
 - a. Request to see the formal credentials of the Compliance Officer and obtain the name and identification number of the Compliance Officer.
 - b. Contact the Safety Director.

- c. Document your conversation with the Compliance Officer. Note everything the Compliance Officer said or did.
 - d. Show the Compliance Officer professional courtesy and respect at all times. You can be firm without being discourteous or rude.
6. Upon notification of an impending OSHA inspection, the Safety Director will determine the course of action to take. The decision will be based on a number of factors including the type of inspection, previous area OSHA experience, contract policies, predetermined decision of Management, as well as discussions with the Superintendent or Safety Professionals.
7. The Safety Director should make arrangements to be present during opening and closing conferences pursuant to an OSHA inspection.
8. The Superintendent will serve as the primary contact with the Compliance Officer for Brookstone, L.P. throughout the inspection process and must accompany the Compliance Officer at all times.
9. During the course of the inspection, the Compliance Officer may ask to see various written programs and procedures. Note all documents the Compliance Officer asked to review. A copy of all documentation shown to the Compliance Officer must accompany the notes.
10. It is usual practice for the Compliance Officer to take photographs, or ask permission to do so, of various conditions found on the project. Take the same pictures the Compliance Officer takes. Take pictures from the same and then from different angles.
11. In most cases, the Compliance Officer will want to interview some of the Company's employees. The Superintendent should make it clear to the Compliance Officer that any request for an employee interview be directed to the Superintendent. In other words, the Compliance Officer should not be permitted to indiscriminately approach Brookstone, L.P. employees and question them.
12. When asked to interview a particular employee, the following procedure should be followed:
 - a. The Superintendent should introduce him or herself to the selected employee.
 - b. The Superintendent should explain to the employee that OSHA is conducting an inspection on the job site and the Compliance Officer would like to interview the employee.
 - c. Explain in a neutral manner that the employee has the right to agree to the interview and that the employee also has the right to refuse the interview. Make

it clear that is entirely the Employee's choice and the Company does not want to influence him/her in either direction.

- d. If the employee does consent to the interview, inform him or her that it is their right to have an attorney present during the interview. If they so desire, the employee can also ask to have a Company Representative (such as the Superintendent or Safety Director) present. OSHA may not allow a Company representative to be present, but often will agree. Once again, the choice is theirs and the Superintendent should clearly state that the Company has no preference.
- e. Explain that the Compliance Officer may ask the employee to sign a statement at the close of the interview. If so, advise the employee:
 - i. That whether or not he/she signs the statement is solely up to him/her and they have the right not to sign it, if for any reason he/she does not want to.
 - ii. Read the statement carefully before signing.
 - iii. If the statement does not accurately reflect what the employee said in the interview, the statement should not be signed until corrections are made that makes the statement completely accurate.
 - iv. Further, if asked to sign a statement, the employee has the right to request a copy of that statement whether he/she signed it or not, and we strongly advise them to do so. The copy should be obtained before handing the original back to the Compliance Officer.
- f. The Superintendent should then ask the employee if he/she has any questions and should answer any questions the employee has. The Superintendent should then ask if the employee consents to be interviewed. If so, the Superintendent should ask the employee if he/she would like to have a Company Representative or attorney present during the interview.
- g. The Compliance Officer should be informed of the employee's decision.
- h. In either case, the employees name, employee number and address should be recorded.
- i. If the Superintendent is allowed to be present during the interview, the Superintendent should interrupt only if:
 - i. The Compliance Officer is attempting to confuse, mislead or intimidate the employee.
 - ii. The Compliance Officer is obviously confused or misinterpreting the employee's statement.

-
- iii. The Superintendent should also make notes as to the types of questions asked and the employee's responses.
 - j. The Superintendent should be present during the interview of any Manager or Supervisor of the Company, and should seek and receive assurances before hand that the Compliance Officer will provide a copy of the statement at the end of the interview.
13. In the event an in-depth OSHA inspection occurs, where more than one (1) Compliance Officer is conducting the inspection, an adequate number of Company Support Personnel will be utilized to assist in the inspection.
 14. The Compliance Officer is not allowed to cause undo delay to the installation. If you feel the Compliance Officer is causing undo delay, you can request that the interviews be postponed until after normal working hours for the particular project. If normal working hours are a ten (10) hour day, the interview could continue after the end of the ten (10) hour shift.
 15. In all phases of the inspection, it is imperative that extensive notes be kept by the Superintendent. A description of alleged violations, employee names, employee numbers and addresses of employees who were exposed to the alleged violations and equipment used or not used by the Compliance Officer (i.e. tape measure, industrial hygiene instrumentation, etc.).
 16. Notes should be taken on the attached sheet and sent to the Safety Director. Use additional paper, if ample room is not provided.
 17. Once the walk-around portion of the inspection is completed, the Compliance Officer will hold a closing conference. During the closing conference, extensive notes should be taken since the Compliance Officer will review what was found during the inspection.

DO NOT ADMIT TO ANY ALLEGED VIOLATION AT ANY TIME DURING THE INSPECTION OR CLOSING CONFERENCE.

18. During the Compliance Officer inspection, the Superintendent must make a written OSHA inspection report. The report should include the following information:
 - a. Name and location of the facility of jobsite inspected.
 - b. Date and time of inspection.
 - c. Name and identification number of the Compliance Officer.
 - d. Reason for inspection.
 - e. Names of opening conference participants.
 - f. Description of Safety Programs and material presented to the Compliance Officer.
 - g. Project safety and security restrictions such as photographs.

- h. Names of inspection party participants listing job functions or title.
- i. A general description of the area or items inspected and findings.
- j. Names of employees or witnesses interviewed by the Compliance Officer.
- k. Description of photographs taken.
- l. Industrial hygiene measurements taken such as air sampling for toxic substances and preliminary results if available.
- m. Names of closing conference participants.
- n. Compliance Officer's remarks and comments during the closing conference.
- o. Citations alleged and proposed abatement dates.
- p. Action taken to correct alleged violation.
- q. Any additional information pertinent to the inspection.
- r. Names, addresses and telephone numbers of all employees with knowledge of anything the Compliance Officer looked at during the inspection.

Types of Inspection

There are several types of inspections. Your actions and how you co-operate may alter based on the type of inspection.

1. Employee complaint:
 - a. Make the employee available to the Compliance Officer, if so requested.
 - b. Show Compliance Officer specific area of complaint.
 - c. Request a copy of the complaint from the Compliance Officer. Be insistent on getting a copy, so we can fully understand the complaint.
2. Drive by:
 - a. Allow the Compliance Officer access to the area of concern.
3. General Inspection:
 - a. Co-operate fully with all requests, as long as the above guidelines are adhered to by the Compliance Officer.
4. Special emphasis:
 - a. Co-operate fully with all requests, as long as the above guidelines are adhered to by the Compliance Officer.
5. Fatality:
 - a. Co-operate fully with all requests, as long as the above guidelines are adhered to by the Compliance Officer.

General Considerations

Our chances of coming out of a Federal or State OSHA compliance inspection with a few or no citations can be enhanced by following a few basic rules:

1. **Safe Work** - Our best defense against citation is to maintain a jobsite that can withstand the toughest of OSHA inspections. Though this may not be possible in every instance, it helps protect us in the long term from needless citations and fines.
2. **Professional Attitude** - The manner in which the Compliance Officer is handled will have a significant bearing on the Compliance Officer's final inspection report and citation recommendations. The Compliance Officer should be treated in a courteous, professional, firm and fair manner at all times.
3. **Required Posting and Records** - Make sure that the OSHA informational poster is properly displayed and that all required records are accurately maintained. These items are examined almost always during an inspection.
4. **Jobsite Appearance** - Orderliness and good housekeeping practices are a must. These are the first items a Compliance Officer sees when entering a jobsite. Usually, the sloppy job will be inspected more closely than the one well kept.
5. **Documentation** - A documented policy of assuring safe working conditions for all employees must be established and maintained. Compliance Officers look for documented proof that an Employer's safe program functions, more or less, as intended. Often these records will convince the Compliance Officer that a citation is not justified or warrants a less serious classification.
6. **Answering Questions** - Do not volunteer information regarding any safety condition, piece of equipment or terms and condition of employment. Answer only the questions you know the answers to, be honest and courteous.
7. **Good Will** – If the Compliance Officer addresses a situation or a condition, we should take action at that time to make corrections. We can do this and not admit any guilt. Suggestions by the Compliance Officer to do things a different way do not always result in a citation.

EQUIPMENT MAINTENANCE

General

In order to have a successful safety program, equipment maintenance must be a key component to any safety program. Having safe operating equipment will prevent accidents and injuries.

All Brookstone, L.P. equipment must be inspected daily prior to operation. Any deficiencies must be corrected before any Brookstone; L.P. employee may operate that piece of equipment. If the deficiency cannot be corrected within a reasonable amount of time, the equipment must be tagged out of service until the deficiency is resolved.

Heavy Equipment

1. Case 570 MXT
2. Street Sweeper
3. John Deer Gator
4. 753 G-Series Skid Steer
5. 753-G Series Skid Steer
6. New Holland Tractor
7. Genie GS-1930 Scissor Lift
8. Genie GS-1930 Scissor Lift
9. Genie GS-1930 Scissor Lift
10. Genie One Man Electric Lift

Inspection of Equipment

At a minimum, all Brookstone, L.P. equipment must be inspected prior to operation. Each piece of equipment will have a daily log located on the equipment for employees to complete after the inspection. The inspection check list will be specific for each piece of equipment.

As recommended by the manufacturer, all Brookstone, L.P. heavy equipment must be inspected and serviced by a qualified technician. Please refer to the owner's manual for the service intervals.

All equipment serviced by a qualified technician must be documented on the log and in addition all paperwork for the service provided must be kept with the piece of equipment. Any employee found operating equipment without inspecting it prior will be subject to Brookstone's Disciplinary Rules.

Operator Training

Employees must be properly trained to operate heavy machinery. **No exceptions to this rule.** If employee has not been trained to operate a specific piece of equipment, please contact Chris Roberts to set up the training.

Any training conducted on a piece of equipment must be documented and kept in the employee's file.

Any employee observed operating a piece of equipment will be subject to Brookstone's Disciplinary Rules.

SAFETY ENFORCEMENT POLICY

It is the policy of Brookstone, L.P. to expect all employees to abide by safe rules at all times. Supervisors are expected to monitor and enforce these safety rules equally. Employees are subject to disciplinary action for any of the offences listed below. The following disciplinary guidelines shall be the minimum consequences of misconduct. Any willful misconduct, in the sole judgment of any Brookstone, L.P. Officer or Senior Manager, may be grounds for immediate termination. In the event of an employee's suspension for disciplinary reasons, to the extent permitted by law benefits will not accrue nor be recoverable during the suspension period.

This enforcement policy is intended to establish guidelines. Nothing contained in this policy shall be construed as modifying or revoking an employee's At Will employment status.

A. SERIOUS MISCONDUCT

1. Failure to report personal injury resulting from an on-the-job work situation.
2. Failure to use personal protective equipment.

DISCIPLINARY ACTION

- | | |
|-------------------|--|
| a. First offense | Verbal Warning |
| b. Second offense | Written Warning |
| c. Third offense | Five (5) Days off without pay to termination |

B. VERY SERIOUS MISCONDUCT

1. Misuse of company equipment.
2. Speeding or reckless driving or unauthorized use of company vehicle.
3. Disregard safety rules.

DISCIPLINARY ACTION

- | | |
|-------------------|--|
| a. First offense | Written Warning |
| b. Second offense | Five (5) Days off without pay to termination |
| c. Third offense | Immediate Termination |

C. INEXCUSABLE MISCONDUCT

1. Fighting on job site or company property.
2. Theft of any item on project.
3. Reporting to work under the influence of alcohol or illegal drugs, possession, sale or use of illegal drugs or consumption of alcohol while working on job site, or company vehicles.
4. Gross negligence or willful acts in the performance of duties resulting in damage to company property or injury to others.
5. Willfully misusing company property.
6. Serious safety violation resulting in injury.



DISCIPLINARY ACTION

- | | |
|-------------------|--|
| a. First offense | Five (5) Days off without pay subject to immediate termination |
| b. Second offense | Immediate Termination |

HAZARD COMMUNICATION AND EMPLOYEE RIGHT-TO-KNOW

This information was prepared to help Brookstone, L.P. meet the basic OSHA Hazard Communication (Right-to-know) regulation. It is instruction in performing chemical surveys, obtaining the appropriate Material Safety Data Sheets (MSDS) forms, employee training, documentation and keeping up to date with chemical changes and employee changes. This program is designed with the three following categories:

I. Overview of the Regulation

A basic review of hazard communications regulations and the key part to the right-to-know program along with the “Hazard Communication Written Program” for Brookstone, L.P. that shall be included in each MSDS manual for each jobsite.

II. Chemical Inventory

This tells how to identify materials considered having physical and health hazards that may be on your jobsite.

III. Employee Training

An outline of employee training requirements and what employees should be able to recall after the training.

A sample form of Material Safety Data Sheets with a section by section explanation to assist in employee training.

OVERVIEW OF THE REGULATIONS

Hazard communication and employee right-to-know regulations were passed to provide employers and employees with information to protect themselves from chemicals used at work.

It is the employer's responsibility to comply with the regulations and stay up-to-date to avoid charges of "failure to warn employees or others" about the chemical dangers.

Chemicals we are concerned about may cause health effects such as:

1. Burns or rashes
2. Lung, liver or kidney damage
3. Heart problems
4. Nerve disorders
5. Sterility or birth defects
6. Cancer

Chemicals can also be involved in sudden accidents such as fires and explosions in addition to the occupational health effects.

Because the safety of our employees is of the utmost concern, Brookstone, L.P. will carefully plan and purchase appropriate material to minimize hazards or avoid dangerous chemicals if possible.

Pass on the chemical information sent by the supplier to employees

Be responsive to employee questions and complaints, some of which are likely to come in response to information supplies by the employer.

Pay the costs of additional record keeping, improving safety and health evaluations and employee training.

CHEMICAL INVENTORY LIST

Using the form, at the end of this section, make an inventory list of all hazardous chemicals Brookstone, L.P. has on site. This list is to be updated as new material is delivered to the jobsite. For the classification, use the guidelines listed below:

According to OSHA, you should list materials with these physical characteristics:

1. Flammable
2. Explosive
3. Compressed gas
4. Unstable or reactive chemical

Or, health hazard characteristics which may be:

1. Poisonous
2. Corrosive
3. Irritants
4. Chemical damaging the skin, eye or lungs
5. Cancer causing agents

Whether a specific material is hazardous may be found by review of a Material Safety Data Sheet (MSDS). The list should be updated as soon as new chemicals enter the workplace. The list must give product or chemical names or numbers which will match their MSDS which will give the chemical name, how much is onsite and where it is located. It is better to tell employees about the chemicals in their own work area instead of all areas, and educate them generally where to find information regarding other chemicals. This should reduce their concerns and the amount of training they will need.

MATERIAL SAFETY DATA SHEETS

Material Safety Data Sheets (MSDS) are used to supply hazard information to chemical users. MSDS is basically a technical bulletin usually two (2) to four (4) pages in length. It contains information including:

1. Name and address of the company which wrote the MSDS
2. Common and chemical name(s) of the product and ingredients including carcinogens
3. Chemical characteristics
4. Physical characteristics
5. Health hazards
6. Reactivity data
7. Spill or leak procedures
8. Exposure control measures
9. Special handling and storage precautions

No specific form is required for an MSDS as long as this type of information is made available. While the Superintendent may rely on the MSDS they receive, you should check them and ask suppliers to certify that the MSDS meets the rules of the hazard communication standard. If there is a question or problem, call the company which made the MSDS.

The MSDS information must be available to the employee. The employee should be able to get the information in their own work area anytime during their work shift.

WRITTEN HAZARD COMMUNICATION PROGRAM REQUIREMENTS

The written program must provide an outline of how the employer plans to tell employees about general compliance with the regulation. The main points the program must specify are:

1. The preparation of an up-to-date written list of all the hazardous chemicals present in the workplace.
2. The collection of up-to-date Material Safety Data Sheets (MSDS) from the suppliers of all chemicals on the written hazardous chemicals list.
3. How all hazardous chemicals coming into the workplace will be checked for proper labels and MSDSs.
4. How labels or warning signs will be attached to bulk storage containers and other containers that hold hazardous chemicals in the workplace.
5. A plan for the training of employees.
6. How independent contractors working in the site will be told of the chemical hazards they may face and the precautions they may take to protect themselves.
7. The procedure for telling employees about the chemical hazards of unlabeled pipes in the workplace.
8. The method for telling employees of the hazards of non-routine tasks such as handling spills and clean up, entering confined spaces, repair and maintenance operations.
9. Exactly where and how employees may obtain access to the written hazard communication program and the MSDS.

IMPORTANT PROGRAM ELEMENTS

Chemical Labeling

For all chemicals which could be hazardous, there should be warning labels. Chemical containers should already have labels from the manufacturer. They should be printed on or attached to the container so that they will be readable as long as it holds the chemical. The labels can use pictures and writing, but must be easy to read and understand.

Labels may only list the most important hazards. Each label should have information regarding:

1. The product name and what the chemical is,
2. How hazardous it is (CAUTION or DANGER type warnings),
3. What injuries the hazard may cause (...CAUSE BURNS...),
4. How to protect yourself from the hazard (AVOID CONTACT WITH SKIN...),
5. How to dispose of the empty containers if hazardous,
6. Emergency instructions,
7. The name of the manufacturer.

When there are permanent containers, labels may be in the form of placards, signs, batch tickets, process sheets or operating procedures. Portable containers filled from labeled containers and used by one employee for their work do not have to be labeled. Containers of chemicals leaving the workplace must be labeled.

Medical and Exposure Monitoring

Medical examinations and chemical exposure testing may have to be done depending on the chemicals used (lead, asbestos...). These should be done by people with experience or training in medicine or the evaluation of hazardous chemicals. Employers may also get help from OSHA consultants or other specialists in these fields.

Disposal

To dispose of hazardous chemicals, employers may have to make special plans. If the waste is flammable, corrosive, explosive or toxic, there may be EPA, DOT or other rules for its disposal. The EPA is a good source to get help.

Program Review and Records

The employer should plan to review the hazard communication program now and then. The review should check to see that changes have not occurred in the facility or operations and that all files and records are being kept up-to-date.

The employer should keep records on chemical lists, material safety data sheets, employee training records, any written chemical notices, warnings and emergency plans, employee complaints and what was done about them, any medical or chemical survey reports and special chemical disposal information. These records and any others dealing with the handling of any hazardous chemical should be kept for as long as the government wants them (minimum of five years). They also serve as company records to document changes and achievements.

HAZARD COMMUNICATION WRITTEN PROGRAM

This program has been prepared to comply with the requirements of the Federal OSHA standard 1926.59 and to insure that information necessary for the safe use, handling and storage of hazardous chemicals is provided to and made available to employees.

This program includes guidelines on identification of chemical hazards and the preparation and proper use of containers labels, placards and other types of warning devices.

Chemical Inventory

1. Brookstone, L.P. maintains an inventory of all known Brookstone, L.P. directly purchased chemicals in use on the worksite. A chemical inventory list is available from the Project Superintendent.
2. Hazardous chemicals brought onto the worksite by Brookstone, L.P. will be included on the hazardous chemical inventory list.

Container Labeling

1. All chemicals on site will be stored in their original or approved containers with a proper label attached, except small quantities for immediate use. Any container not properly labeled should be given to the Superintendent for labeling or proper disposal.
2. Workers may dispense chemicals from original containers only in small quantities intended for immediate use. Any chemical left after work is completed must be returned to the original container or Superintendent for proper handling.
3. No unmarked containers of any size are to be left in the work area unattended.
4. Brookstone, L.P. will rely on manufacturer applied labels whenever possible, and will ensure that these labels are maintained. Containers that are not labeled or on which the manufacturer's label has been removed will be relabeled.
5. Brookstone, L.P. will ensure that each container it provides is labeled with the identity of the hazardous chemical contained and any appropriate hazard warnings. All subcontractors shall be responsible for ensuring that each container they provide is also properly labeled.

Material Safety Data Sheets (MSDS)

1. Employees working with a Hazardous Chemical may request a copy of the MSDS. Requests for MSDS's should be made to the Superintendent.
2. MSDS should be available and standard chemical reference may also be available on the site to provide immediate reference to chemical safety information.
3. An emergency procedure to gain access to MSDS information will be established.

Employee Training

Employees will be trained to work safety with hazardous chemical.

1. Methods that may be used to detect a release of a hazardous chemical (s) in the workplace.
2. Physical and health hazards associated with chemicals.
3. Protective measures to be taken.
4. Safe work practices, emergency responses and use of personnel protective equipment.
5. Information on the Hazard Communication Standard including labeling and warning systems, and an explanation of Material Safety Data Sheets.

Emergency Response

1. Any incident of overexposure or spill of a hazardous chemical/substance must be reported to the Superintendent.
2. The foremen or the immediate supervisor will be responsible for insuring that proper emergency response actions are taken in leak/spill situations.

Hazards of Non-Routine Tasks

1. Supervisors will inform employees of any special tasks that may arise which would involve possible exposure to hazardous chemicals.
2. Review of safe work procedures and use of required PPE will be conducted prior to the start of such tasks. Where necessary, areas will be posted to indicate the nature of the hazard involved.

Informing Other Employers

1. Other on site employers, including all subcontractors, are required to adhere to the provisions of the Hazard Communication Standard.
2. Information on hazardous chemicals known to be present will be exchanged with other employers. Employers will be responsible for providing necessary information to their employees.
3. Other on site employers will be provided with Brookstone, L.P. Hazard Communication Program

Posting

1. Brookstone, L.P. has posted information for employees at this jobsite on the Hazard Communication Standard. This information can be found at the job trailer.

MAKING THE CHEMICAL INVENTORY

What is a Hazardous Chemical? Any chemical which is determined to have a physical or a health hazard is covered by the OSHA rule. A chemical is automatically considered hazardous if it is:

1. On the OSHA Z list, 39FR 1910.1000,
2. Listed in the “Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment,” by the American Conference of Governmental Industrial Hygienists, or listed as a carcinogen in:
 - a. National Toxicology Program. Annual Report on Carcinogens,
 - b. International Agency for Research on Cancer, Monographs.

You may have other hazardous chemicals in your work place in addition to those chemicals identified on the lists. Other hazardous chemicals not on the “automatic” lists are also covered and the OSHA Rule provides guidelines for determining other hazardous chemicals in your work place. So, do not rely only on above lists. It is the Superintendent, supervisor, or foreman responsibility to determine if any chemical has hazardous PHYSICAL HAZARD CHARACTERISTICS such as:

1. **COMBUSTIBLE LIQUID** – any liquid with a flash point at or above 100 degree F (37.8 degree C) but below 200 degree F (93.3 degree C).
2. **COMPRESSED GAS** – gasses stored at pressures exceeding 40 psi at 70 degree F or 1043 psi at 130 degree F or a liquid vapor pressure above 40 psi at 100 degree F.
3. **EXPLOSIVE** – a chemical capable of an almost instantaneous release of pressure, gas and heat.
4. **FLAMMABLE** – aerosol, gas, liquid or solid which will burn under specified conditions.
5. **ORGANIC PEROXIDE** – an organic compound considered a derivative of hydrogen peroxide.
6. **OXIDIZER** – a chemical other than an explosive that promotes combustion in other materials through oxygen or other gas releases.
7. **PYROPHORIC** – a chemical that will ignite spontaneously in air at temperatures at or below 130 degree F (54.4 degree C).

8. **UNSTABLE** (reactive) – a chemical that will itself react bigorously due to shock, pressure or temperature.
9. **WATER REACTIVE** – a chemical that will react with water to release a flammable or hazardous gas.

... or a chemical may be a HEALTH HAZARD if exposure to the chemical can cause immediate or long-term ill health effects, such as:

1. **SENSITIZERS** – chemicals that will cause allergic reactions after repeated exposures.
2. **IRRITANTS** – chemicals that will cause temporary reactions at the site of contract.
3. **CORROSIVE** – chemicals causing permanent damage or changes.
4. **TOXIC** and highly toxic agents – chemical which are deadly in small doses.
5. **CARCINOGENS** – chemicals causing or promoting cancer.
6. **TERATOGENS** – can cause birth defects
7. **MUTAGENS** – can product chromosomal (genetic) aberrations
8. **REPRODUCTIVE TOXINS** – chemical affecting reproductive capabilities.
9. **HEPATOTOXINS** – chemicals which produce liver damage.
10. **NEPHROTOXINS** – chemicals which produce kidney damage.
11. **NEUROTOXINS** – chemicals mainly affecting the nervous system.
12. Chemicals that act on the hematopoietic (blood) system.
13. Chemicals that damage the skin, eyes, mucous membranes, lungs or other body systems.

EMPLOYEE TRAINING

Employees must receive training on the hazards of the chemicals they may be exposed to and the ways they can avoid those hazards. Employees should be trained on:

1. The basics of the hazard communication standard.
2. Specific operations where hazardous chemicals are, or may be, present.
3. Where they can find the written hazard communication program.
4. List of hazardous chemicals.
5. MSDS (must always be available)
6. How chemicals may be detected (for example, by color, odor, instruments).
7. Physical hazards (such as flammability, gas under pressure...).
8. How the chemicals may affect the body (long and short-term) through breathing, swallowing or skin contact.
9. How to protect themselves from overexposures (through use of work practices, personal protective equipment, emergency procedures...).
10. How to read a MSDS.
11. The need for additional training when there is a job change, when a new employee starts work on the site, or a new chemical is introduced to the work area.

Before the training, the Superintendent, his assistance, or foreman should try to do three (3) things:

1. Consider replacing hazardous chemicals with less hazardous ones and disposing or removing unnecessary ones.
2. Decide who, how and where program records including MSDS, chemical lists and the written program will be kept and distributed.
3. The personal protection equipment in use should be checked to see if it is the right kind or if changes should be made.

Following any training, the employer should write down:

1. When it was done and the employees involved.
2. What the topic of the training was.
3. For training classes, have the employee sign an attendance statement.

PLANNING THE TRAINING ACTIVITIES

At a Minimum, the Hazard Communication Training Program Needs to Inform Employees:

1. About Hazard Communication Regulation.
2. The location and availability of
 - a. written hazard communication program,
 - b. Hazardous chemicals list,
 - c. Material Safety Data Sheets (MSDS)
3. The hazardous chemicals in the workplace, the information and training available to them.
4. How to protect themselves and reduce or stop exposure to hazardous chemicals.
5. How to read and understand labels and MSDSs.

Specific Hazardous Chemical Training Needs to Address:

1. What hazardous chemicals are used and where they are in the workplace.
2. The nature (odor or visual appearance) and hazard of the chemical, including immediate and long-term health hazards.
3. The different types of chemicals and their major hazards (i.e., solvents, corrosives, acids).
4. How the operation involving hazardous chemicals may cause employee exposure.
5. Information to help the employee to recognize and understand how and where the release of hazardous chemicals can happen.
6. Provide information on the first aid that is available.
7. The work practices and personal protective equipment which are available. How to use the equipment, where it is and how to get it.
8. What chemical detection or monitoring devices are used?
9. Explain how new employees will be trained.

10. How training for new hazardous chemicals brought into the workplace and new hazards discovered for chemicals already in use will be done.

Training May Be Done Using Any of the Following:

1. Handout material.
2. Movies, slide shows or video tapes – example of labels and Material Safety Data Sheets.
3. Demonstration of protective equipment; what it is, how to wear it and where it is located.
4. Training discussions, meetings and review tests or quizzes.

MONITORING TRAINING RESULTS

What Employees Should Remember After Training

1. Basic requirements of “Right-to-know” regulation.
2. Jobs and locations where chemical exposures are, or may be, present.
3. Location of:
 - a. Written hazard communication program (includes list of hazardous chemical);
and
 - b. Material Safety Data Sheets (MSDS) – always available.
4. How they may recognize specific chemicals using monitoring devices, or identification by color, odor, gas liquid, etc.
5. Physical hazards, for example, flammability, or compressed gas.
6. Effects the chemical has on the body (long and short term) through breathing, swallowing or skin contact.
7. How workers can protect themselves from overexposure or during emergencies, by safe work practices, personal protective devices, emergency procedures.
8. What the company written hazard communication policy/program specifically states.

USING MATERIAL SAFETY DATA SHEETS (MSDS)

The Material Safety Data Sheets (MSDS) give the basic information which must be supplied by a chemical supplier or manufacturer.

All MSDS should be dated with the month and year written.

A common version of the MSDS follows with an explanation of the type of information required in each section. This may be very useful for training employees who need help to interpret technical information.

OSHA does not require this or any particular form. Any form which represents the required information in a usable format is acceptable.

The following form is helpful for employee training. Container labels are also an important source for health hazard information.

TRAINING SESSION ON HAZARD COMMUNICATION

I know where the Material Safety Data Sheets (MSDS) for my work are kept.

I understand the safe work procedures and precautions to be taken when working with these products including use of protective equipment and/or apparel.

I know where emergency supplies are kept.

I know where the emergency phone number and Hazard Communication Information are posted.

I am aware that I may review copies of the hazardous chemical list, the company's written program, and MSDS's.

Employee Name (Print): _____

Employee Signature: _____ **Date:** _____

Project Name: _____ **Project No.:** _____

Superintendent Name (Print): _____

Superintendent Signature: _____ **Date:** _____

**INCIDENT INVESTIGATION REPORT LONG FORM
WITH OR WITHOUT INJURY OR DAMAGE**

Date: _____ Time: _____ A.M. € P.M. €

Superintendent: _____ Project No.: _____

Project Name: _____

Location of Incident:

Description of Incident:

Did an injury result? Yes € No € Equipment Involved: _____

Individual: _____ Years with Company: _____ Years in Trade: _____

Employed by: _____ Phone #: _____

Address: _____

Statements from Person(s) Involved/Witnesses in the Incident

(Use the Back of This Sheet for Additional Persons, if Needed)

Person #1 (Print Name): _____ Involved € Witness € Phone #: _____

Employed by: _____ Supervisor (Print Name): _____

Address: _____

Statement: _____

Signature: _____ Date: _____



Person #2 (*Print Name*): _____ Involved € Witness € Phone #: _____

Employed by: _____ Supervisor (*Print Name*): _____

Address: _____

Statement: _____

Signature: _____ Date: _____

Person #3 (*Print Name*): _____ Involved € Witness € Phone #: _____

Employed by: _____ Supervisor (*Print Name*): _____

Address: _____

Statement: _____

Signature: _____ Date: _____

Person #4 (*Print Name*): _____ Involved € Witness € Phone #: _____

Employed by: _____ Supervisor (*Print Name*): _____

Address: _____

Statement: _____

Signature: _____ Date: _____

Person #5 (*Print Name*): _____ Involved € Witness € Phone #: _____

Employed by: _____ Supervisor (*Print Name*): _____

Address: _____

Statement: _____

Signature: _____ Date: _____

BROOKSTONE, L.P. SAFETY ORIENTATION

Orientation:

- All BROOKSTONE and subcontractor construction personnel must attend the safety orientation prior to beginning work on BROOKSTONE jobsites.
- Construction personnel will receive a sticker after completion of the orientation. Sticker must be placed on their hard hat.

Conduct:

- You cannot bring to the Jobsite:
 1. Alcoholic beverages
 2. Illegal drugs or Rx drugs not in your name
 3. Guns of any kind
- Fighting is grounds for immediate termination
- Vehicle parking in designated areas only

Clothing:

- Tank tops, sleeveless shirts, undershirts, shorts, or cut off jeans are prohibited.
- Clothing must be neat and maintained in good repair.
- Safety Vest required at all times.

Footwear:

- Sandals, tennis shoes or dress shoes are not approved on any jobsite
- Work boots or work shoes must have substantial soles and must be in good repair

Electrical:

- All electric tools, cords and power sets must be inspected daily prior to being placed in service
- All electric tools, equipment and extension cords found to be defective shall be immediately repaired or removed from the jobsite.
- GFCI (ground fault circuit interrupters) protection is required for all power tools and extension cord use. (no exceptions)

Fall Protection:

- Fall protection shall be provided for and used by all employees working six feet or more above a lower level

Scaffolding:

- Fall protection is required at 6 feet or more.
- Scaffolds must be inspected daily and tagged appropriately before use.
- Employees erecting, dismantling, moving and working off the scaffold must be trained.

Accident Reporting:

- All accidents, no matter how minor must be reported to the employee's immediate supervisors & BROOKSTONE's superintendent even if medical treatment is not required
- In the event of an act or condition which is immediately dangerous to life and health, work activity will be stopped until the act or condition is corrected and the exposure no longer exist.

Discipline:

- Failure to comply with the provisions of the safety program will result in disciplinary action which may include removal from the jobsite
- BROOKSTONE reserves the right to remove an employee or employees from the jobsite for an egregious violation that could result in serious injury or death.

I have attended the BROOKSTONE Safety Orientation. I acknowledge my commitment to observe all project safety rules, and agree to conduct my work in a safe and professional manner.

Print Name: _____

Signature: _____

Sticker #: _____

Date: _____

Company Name: _____

Project Name: _____

Hazard Communication:

- Each company must provide BROOKSTONE with a copy of their Hazard Communication Program and MSDS specific to the jobsite.
- Your company is required to provide you with hazard communication training prior to arrival at the worksite.

Trenches/Excavations:

- All trenches or excavations 4 feet or more in depth must be sloped, shored, benched or made safe by other approved means. (no exceptions)
- Trenches or excavations must be inspected daily before employees can work in them.
- All trenches and excavations must have ladders for safe access/egress.

Hot Work:

- Portable fire extinguishers must be positioned in every hot work area involving sparks, open flames, or heat producing work.
- A fire watch shall be maintained for a minimum of 30 minutes following the completion of hot work
- Fire extinguishers must be fully charged, and in good operating condition.

Powder Actuated Tools:

- Only workers who have the required certification can operate these tools

Personal Protective Equipment:

- Hard hats are required for all workers on every jobsite
- Eye Protection is required at all times.
- Eye and face protection is required for workers operating masonry saws, chop saws, cutting/welding tools, concrete chippers, power grinders and other exposures to eyes and face.
- High noise exposures – ear plugs or muffs are required

Housekeeping:

- Work areas must be kept neat and clean at all times
- Dust shall be controlled in work areas
- Combustible scrap and debris must be removed from work areas in a timely manner
- All hazardous waste must be removed and disposed of according to appropriate regulations

Training:

- All employees are required to attend or conduct Weekly "Tool Box Safety Meetings" meeting minutes are to be copied to BROOKSTONE's superintendent

3. Personal Protective Equipment	A	B	C	N/A	ACTION TAKEN
• Hard hats?					
• Safety glasses/face shields?					
• Respirators are used when required?					
• Hearing protection being worn when required?					
• Traffic vest being worn when required?					
• Proper clothing being worn?					
4. Medical Emergency	A	B	C	N/A	ACTION TAKEN
• First-aid kit?					
• First-aid/CPR on-site?					
• Eye wash station?					
• Map to medical facility?					
• Team contact numbers posted and emergency #'s posted?					
5. Fire Protection	A	B	C	N/A	ACTION TAKEN
• Adequate fire extinguishers, checked and accessible?					
• Emergency vehicle access?					
• Proper fuel containers used?					
• "No Smoking" posted and enforced near flammables?					
6. Electrical	A	B	C	N/A	ACTION TAKEN
• Cords and tools in good condition?					
• Energized parts protected?					
• Ground fault circuit interrupters being used and inspected?					
7. Fall Protection	A	B	C	N/A	ACTION TAKEN
• Fall protection being utilized at 6' and above?					
• Fall protection equipment in good working condition?					
• Roof edges protected?					
• Protection from falling objects?					
• Guardrails installed and in good working condition?					
8. Scaffolding	A	B	C	N/A	ACTION TAKEN
• All scaffolding inspected daily?					
• Erected on sound rigid footing?					
• Tied to structure as required?					
• Fully planked?					
• Proper access to platforms? (ladders, gates, etc)					
• Bracing and pins in place?					
• Employees below protected from falling objects?					
• Proper loading of materials?					
• Guardrails in place at 10' and above?					
• Toeboards installed?					
9. Ladders	A	B	C	N/A	ACTION TAKEN
• Ladders extend at 36" above the landing?					
• Ladders are secured to prevent slipping, sliding and falling?					
• Ladders with split or missing rungs taken out of service					
• Stepladders used in fully open position?					
• Proper use of ladder?					

10. Trenches, Excavation & Shoring	A	B	C	N/A	ACTION TAKEN
• Competent person on hand?					
• Excavations are shored or sloped back?					
• Materials are stored at least two feet from trench?					
• Ladders provided every 25 feet in trench?					
• Equipment is a safe distance from edge of trench or Excavation?					
• Daily inspection of trenches/excavations being performed and documented?					
11. Scissor/Aerial Lifts	A	B	C	N/A	ACTION TAKEN
• Equipment loaded properly?					
• Gate or chain secured?					
• Nothing to increase working height?					
• Safe work distances?					
• Surface free of holes and pits?					
• Body harness being utilized when required?					
12. Welding & Burning	A	B	C	N/A	ACTION TAKEN
• Gas cylinders stored upright?					
• Proper separating distance between fuels and oxygen?					
• Burning/welding goggles or shields are used?					
• Fire extinguishers are nearby?					
• Hoses are in good condition?					
13. Cranes	A	B	C	N/A	ACTION TAKEN
• Outriggers are extended and swing radius barricade in place?					
• Operator is familiar with load charts?					
• Hand signal charts are on crane?					
• Crane operator logs are up-to-date?					
• Employees kept from under suspended loads?					
• Chains and slings inspected and tagged as required?					
14. Motorized Equipment	A	B	C	N/A	ACTION TAKEN
• Back up alarm functioning?					
• Operator appears competent?					
• Seat belts used?					
15. Unsafe Acts or Practices Observed (List)					

Comments _____

Superintendent Signature _____ **Date** _____

Project Manager Signature _____ **Date** _____